

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 :
 v. : **No. 21-CR-00395 (TJK)**
 :
EMANUEL JACKSON, :
 :
 Defendant. :

**UNOPPOSED MOTION TO CONVERT THE PLEA HEARING
ON JANUARY 13, 2023 INTO A VIDEO STATUS CONFERENCE**

The United States of America, through counsel, hereby moves this Court to convert the in-person plea hearing currently scheduled for January 13, 2023, into a video status conference. Counsel for defendant Emanuel Jackson does not oppose this motion.

In support of this motion, the Government states as follows:

1. Defendant was charged by criminal complaint on January 18, 2021 [Doc. No. 1], and an information was filed on June 10, 2021 [Doc. No. 28].
2. On December 5, 2022, the Court granted an unopposed motion to continue the plea hearing until January 13, 2023, and excluded time through January 13, 2023, under the Speedy Trial Act.
3. The parties are close to reaching a plea agreement, but additional time is needed for the Government to seek internal approval for a revised plea offer. In addition, Defendant and his counsel reasonably need additional time to review the plea materials and prepare for the plea hearing, which requires coordination among medical experts and others.
4. The parties submit that it would be beneficial to the Court and the parties to convert the plea hearing currently scheduled for January 13, 2023, into a status conference by video, at

which time the parties can update the Court on their plea negotiations and provide their best estimate on when the plea hearing can take place.

5. Defendant remains in compliance with his pre-trial conditions of release.
6. A proposed Order is attached.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the Court grant this Motion to Convert the Plea Hearing on January 13, 2023, into a Video Status Conference.

Respectfully submitted,

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By: /s/ Justin M. Woodard
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Dated: December 21, 2022

CERTIFICATE OF SERVICE

On this 21st day of December, 2022, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ Justin M. Woodard
Justin M. Woodard
Trial Attorney