

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

UNITED STATES OF AMERICA

v.

GREGORY NIX,

Defendant.

CR NO. 21-678

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, hereby files this motion to adjourn the status conference set for Friday, May 6, 2022, in the above-captioned matter, for approximately 45 days, until Monday, June 20, 2022. Defense counsel concurs in this motion. The parties request the additional time to engage in plea negotiations and review additional discovery productions.

The United States also notes, pursuant to the Court's Minute Order directing the parties to inform the Court whether any outstanding plea offers have expired, that no such plea offers have expired. Additionally, new counsel for the United States has just been assigned to the case. The parties need additional time to review the case and engage in meaningful plea negotiations.

The parties request that the Court exclude the time until the status conference on June 20, 2022, pursuant to 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

Date: May 3, 2022

By: /s/ Christopher M. Cook
Christopher M. Cook
Assistant United States Attorney (Detailed)
KS Bar No. 23860
United States Attorney's Office
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: (412-327-3487)
Email: christopher.cook5@usdoj.gov

CERTIFICATE OF SERVICE

On this 3rd day of May, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

By: /s/ Christopher M. Cook
Christopher M. Cook
Assistant United States Attorney (Detailed)
KS Bar No. 23860
United States Attorney's Office
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: (412-327-3487)
Email: christopher.cook5@usdoj.gov