

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
v.	)	
	)	<b>No. 21-CR-678 BAH</b>
<b>GREGORY NIX,</b>	)	
	)	
<b>Defendant.</b>	)	
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**JOINT MOTION TO CONTINUE STATUS CONFERENCE AND TO EXCLUDE TIME  
UNDER THE SPEEDY TRIAL ACT**

The United States, jointly with counsel for the defendant, hereby files this motion to adjourn the status conference, currently set for September 9, 2022, in the above-captioned matter, for approximately 45 days, until Tuesday, October 21, 2022. The parties request the additional time to engage in plea negotiations and review additional discovery productions which are ongoing.

To update the Court on the status of plea negotiations, after discussing options, the United States has received preliminary approval for a plea offer for the defendant which will be formally presented to the defendant in a matter of days. The United States anticipates setting an expiration date for this plea offer at or near the date of the next status conference. The parties thereby request this continuance of 45 days to evaluate this plea proposal and make appropriate decisions about whether this case may be resolved short of trial.

The United States references the Court’s Minute Order directing that the parties provide the Court three proposed trial dates and a proposed motions schedule before the status conference, currently set for September 9, 2022. Pursuant to this joint motion to continue the status conference, the parties also request additional time before preparing a proposed motion

schedule and trial date(s) and/or a change of plea hearing. For the same reasons, the parties need additional time to engage in meaningful plea negotiations and review ongoing discovery productions.

The parties request that the Court exclude the time until the status conference on October 21, 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,

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