UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)		
v.)	No.	21-cr-29 (TSC)
HUNTER EHMKE,)		
Defendant.	j		
)		

JOINT MOTION TO CONTINUE STATUS HEARING

Mr. Hunter Ehmke, by and through his attorney, and joined by the United States Attorney for the District of Columbia, hereby file this Motion to Continue the Status Hearing that is currently scheduled for Friday, September 10, 2021. The parties request that the status be continued for approximately 60 days. As a basis for this request, the parties state the following:

At the last status hearing on April 16, 2021, undersigned counsel advised the Court, under seal, of certain assessments that were being conducted. That process has since been completed and information from those assessments was conveyed to the United States. In response to that conveyance, the United States is seeking approval for a resolution short of trial.

The United States needs more time to seek approval for the proposed resolution, but believes that 60 days is sufficient. The Pretrial Services Agency has noted in past reports that Mr. Ehmke has been completely compliant with his terms of release, and undersigned and the United States have no reason to believe that has changed. *See* ECF No. 14.

The parties further request that the Court find that the continuing plea negotiations are good cause and that the time until the next status hearing should be excluded from the speedy trial calculation in the interest of justice.

Undersigned counsel conferred with the United States and it consented to the filing of this motion on behalf of the parties. The parties further agree that if the Court grants this motion, they will notice it, prior to the next status, and ask for a change of plea hearing.

WHEREFORE, the parties respectfully request that the status hearing in this matter, presently scheduled for September 10, 2021, be continued for 60 days and that the Court find that, in the interest of justice, the time between now and the next status hearing be excluded from the speedy trial calculation.

Respectfully submitted on behalf of the parties,

A.J. KRAMER FEDERAL PUBLIC DEFENDER

 $/_{\rm S}/$

CARA HALVERSON
Assistant Federal Public Defender
625 Indiana Ave. NW, Ste. 550
Washington, D.C. 20004
(202) 208-7500
cara halverson@fd.org

CHANNING D. PHILLIPS Acting United States Attorney D.C. Bar No. 415793

/s/

DINEEN A. BAKER Assistant United States Attorney D.C. Bar No. 487820 555 Fourth Street, NW Washington, DC 20530 202-252-6954 dineen.baker@usdoj.gov

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:
v.	: Cr. No. 21-cr-29 (TSC)
HUNTER EHMKE,	• •
Defendant.	: :
OR	<u>DER</u>
Before the Court is a Joint Motion to Co	ntinue Status Hearing. For the reasons set forth
therein, it is hereby	
ORDERED that the current status heari	ng set for 10:00 a.m. on September 10, 2021 be
continued to November, 2021 at a	/p.m.; and it is further
ORDERED that the time until November	er, 2021 at a/p.m. be excluded from
calculation under the Speedy Trial Act. The Cou	art finds that the ends of justice served by the
granting of such continuance outweigh the best	interests of the public and defendant in a speedy
trial, as the continuance will provide the parties	with additional time to complete plea
negotiations.	
DATE:	
	Judge Tanya S. Chutkan United States District Judge