UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERIC	CA :	
	:	
V.	:	Case No. 21-cr-155 (ABJ)
JACOB HILES,	•	
Defendant	· ·	

JOINT MOTION TO CONTINUE STATUS HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Jacob Hiles, respectfully move this Honorable Court to continue the status hearing currently scheduled for May 26, 2021, to a date in approximately sixty days, with time excluded under the Speedy Trial Act in the interests of justice.

In support of this motion, the parties submit that:

1. The government expects substantial discovery to be made available to the defense shortly.

2. The parties wish to engage in plea discussions.

3. No Pretrial Services Agency report has been filed indicating a need for action regarding the defendant's compliance with the conditions of his release.

4. A continuance of approximately sixty days will allow discovery to be provided and reviewed and plea discussions to take place.

5. The parties are available for a status hearing in approximately sixty days. Specifically, the parties are available on July 22, 2021, and July 23, 2021.

6. The parties agree that the interests of justice will be served by excluding time and outweigh the defendant's and the public's interest in a speedy trial.

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WHEREFORE, the parties respectfully ask this Court to continue the status hearing currently scheduled for May 26, 2021, to July 22, 2021, or July 23, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS ACTING UNITED STATES ATTORNEY

By: <u>/s/ Mary L. Dohrmann</u> MARY L. DOHRMANN NY Bar No. 5443874 Assistant United States Attorney 555 4th Street, N.W. Washington, D.C. 20530 (202) 252-7035 Mary.Dohrmann@usdoj.gov

> <u>/s/ Alexander Bell</u> ALEXANDER BELL Counsel to the Defendant

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Defendant.	:	

[PROPOSED] ORDER

Upon consideration of the Joint Motion to Continue Status Hearing, it is this _____ day of

May, 2021, HEREBY ORDERED that:

- The Motion is GRANTED;
- The status hearing currently scheduled for May 26, 2021, is CONTINUED to July _____, 2021; and
- The interests of justice outweigh the defendant and the public's interest in a speedy trial such that the time from May 26, 2021, to July _____, 2021, shall be excluded under the Speedy Trial Act.

SO ORDERED.

HON. AMY BERMAN JACKSON UNITED STATES DISTRICT JUDGE