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Attorney for Defendant

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY GRACE,

Defendant.

Case No. 1:21-mj-00442-ZMF

**MOTION TO CONTINUE /
RESET PRELIMINARY
HEARING / STATUS
HEARING**

NOW COMES Jeremy Grace, through his attorney, Gerald M. Needham, and moves to continue the presently preliminary hearing / status hearing set for August 2, 2021, at 1:00 p.m., before Magistrate Judge Robin M. Meriweather, by telephone / VTC.

Jeremy Grace has been released on pretrial conditions and is in full compliance. Defense counsel has recently received discovery materials from the government. Those materials are subject to a protective order. Mr. Grace has executed an acknowledgement that said discovery materials are subject to said protective order. Defense counsel is in need of additional time to review discovery materials, conduct legal research, undertake pretrial investigation, and otherwise

properly prepare. Counsel moves to continue the preliminary / status hearing for approximately 60 days, to a date convenient to the Court and the parties.

Assistant United States Attorney Mona Sedky has advised that additional voluminous discovery will be forthcoming during the timeframe of the requested continuance.

Mr. Grace has authorized counsel to represent he consents to the continuance of the preliminary / status hearing with the knowledge that the timeframe is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

AUSA Sedky also authorized counsel to represent the government has no objection to the requested continuance.

Respectfully submitted on July 26, 2021.

/s/ Gerald M. Needham

Gerald M. Needham

Assistant Federal Public Defender