

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY GRACE,

Defendant.

Case No. 21-cr-296 (RDM)

MOTION TO CONTINUE

Mr. Jeffrey Grace currently has a hearing scheduled for July 28, 2022 at 9:00 a.m. Mr. Grace, through counsel, respectfully requests a continuance until November 17, 2022 at 3:30 p.m. The parties have conferred with the Courtroom Deputy and confirmed the Court's availability for this day. The Government has no objection to this request.

In light of new counsel being recently appointed, additional time is required to consult with Mr. Grace about the direction of this matter. Additionally, government counsel has represented that further discovery is forthcoming. Counsel will require time to review and discuss this discovery with Mr. Grace.

Mr. Grace, through counsel, has no objection to exclusion of time under the Speedy Trial Act until the date of the next hearing.

Given the ongoing issues with the COVID-19 pandemic, including the recent surge in cases related to the BA.5 variant, Mr. Grace respectfully request the Court conduct the next hearing via video-conference pursuant to the CARES Act and

Criminal Procedure Rule 43(B).¹ Mr. Grace is 63 years old and resides in the Pacific Northwest. An in-person hearing will require substantial air travel placing him and others he subsequently encounters at risk of contracting the deadly virus.

For the aforementioned reasons, Mr. Grace respectfully requests the Court grant this continuance and conduct the next hearing via video-conference.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

/s/
Jose A. German
Assistant Federal Public Defender
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¹ Mr. Grace, through counsel, recognizes that authorization for video-conference pursuant to the CARES Act is set to expire on August 11, 2022. If further authorization is not in place at the time of the next hearing, Mr. Grace will provide the appropriate written consent pursuant to Rule 43.