

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 1:21-CR-737 (EGS)
v.	:	
	:	
JEFFREY WILLIAM HUBBARD,	:	
	:	
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 defendant Jeffrey William Hubbard, by and through his attorney, Assistant Federal Public Defender Conor Huseby, respectfully move the Court to continue the status hearing currently scheduled for Tuesday, April 26, 2022, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the parties represent:

1. Defense counsel has represented to the government that he requires additional time to continue reviewing case-specific and global discovery with the defendant, and to conduct his own investigation into the defendant's personal background, including potential mitigating evidence.
2. The defendant remains on release with conditions and the parties are not aware of any issues.
3. The parties believe that the requested continuance will allow for further production and review of discovery and facilitate discussions of a potential resolution short of trial.

WHEREFORE, the parties respectfully request that this Court grant the motion for a 60-day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 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), (B)(i), (ii), and (iv).

Respectfully submitted,
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