

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES :
v. : Crim. No. 20-254-1 (APM)
JOHN STRAND :

CONSENT MOTION TO CONTINUE STATUS HEARING

Defendant, John Strand, through undersigned counsel, Stephen F. Brennwald, in support of his Consent Motion to Continue Status Hearing, states as follows:

1. Defendant John Strand, as well as co-defendant Simone Gold, are scheduled to appear remotely for a status hearing on Tuesday, February 8, at 3 p.m.
2. The government has extended plea offers to both defendants, and they are in the process of reviewing the evidence, whose disclosure is ongoing (global discovery-wise) and deciding on what is a life-altering decision for each of them.
3. Because review of discovery, the law, and the plea offers is ongoing, defendant Strand, with the consent and approval of defendant Gold, asks this Court to afford them a few more weeks to make a decision about the government's offer.
4. The United States of America, through Assistant April Ayers-Perez, consents to this request.

5. Defendants and the government have conferred about a new date, and suggest either March 8 or 10, 2022.¹

6. Both defendants have been advised again of their speedy trial rights, and both consent to the exclusion of time under the Speedy Trial Act between February 8, 2022 and the next status hearing date, should this Court grant this motion.

WHEREFORE, in light of the foregoing, and for any other reasons that may appear to this Court, Defendant Strand, with the consent of co-defendant Gold, as well as the government, asks that this court vacate the hearing set for February 8, 2022, reset it to March 8 or 10, or any other date on which the Court and the parties are available, and provide any other relief this Court deems just and proper.

Respectfully submitted,

Stephen F. Brennwald

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¹ Attorney Kira West is unavailable on March 10, 2022, between 12:30 and 1:30 p.m. because of another hearing scheduled to begin at 12:45 that day. That hearing should be brief.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion was submitted, by ECF, this 5th day of February, 2022, to all parties of record.

Stephen F. Brennwald

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