

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

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| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Case No. 1:21-CR-0085-CRC |
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| | : | |
| JOHN STRAND, | : | |
| | : | |
| | : | |
| | : | |
| Defendant. | : | |

**JOINT MOTION TO CONTINUE SEPTEMBER 28, 2021
STATUS CONFERENCE FOR 60 DAYS**

The United States of America, through counsel, and Defendant John Strand, through counsel, hereby move this Court to grant its Joint Motion to Continue September 28, 2021 Status Conference for 60 days. The Government and Defendant further move the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the parties state as follows:

1. On July 15, 2021, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties, and that the Government would continue to supplement discovery.
2. The Government has continued to supplement discovery.
3. The parties have discussed the possibility of pretrial resolution of case, but have not decided upon the parameters of a plea agreement. This is a continuing discussion.
4. On September 24, 2021, counsel for Defendant and the United States agreed that the Court’s Status Conference, which is set for September 28, 2021, should be continued for approximately 60 days to allow the Government to continue to supplement discovery and for the Defendant and counsel to discuss a potential resolution to this case. The parties in that

discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between September 28, 2021 and the next set Status Conference. The parties also request that the Court conduct the next Status Conference via videoconference.

WHEREFORE, for the foregoing reasons, the Government and Defendant John Strand, through counsel, respectfully request that the Court grant this Motion to Continue September 28, 2021 Status Conference for 60 days filed out of time, and further request that the Court exclude the period from September 28, 2021 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

/s/ Stephen F. Brennwald

Stephen F. Brennwald
Brennwald & Robertson, LLP
922 Pennsylvania Avenue, SE
Washington, DC 20003
301-928-7727
sfbrennwald@cs.com

and

CHANNING PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By: /s/ April H. Ayers-Perez
APRIL H. AYERS-PEREZ
Texas Bar No. 24090975
Assistant United States Attorney
Detailee – Federal Major Crimes
United States Attorney’s Office
for the District of Columbia
Telephone No . (956) 754-0946
april.perez@usdoj.gov

CERTIFICATE OF SERVICE

On this 24th day of September 2021, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ April H. Ayers-Perez
April H. Ayers-Perez
Assistant United States Attorney