

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

UNITED STATES OF AMERICA

v.

JONAH WESTBURY,

Defendant.

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CR. NO. 21-371 (RC)

JOINT MOTION FOR A CONTINUANCE

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, by and through his counsel, Sydney Tombers, respectfully move this Court to continue the status hearing scheduled for November 3, 2021. As grounds for this motion, the parties state the following:

1. The parties are still discussing the terms of a possible a plea agreement. Defense counsel reached out to the Government with a proposed resolution and the Government has indicated they need time to seek approval on the terms of their offer to be extended. As such, the parties are requesting that the Court continue the matter to another status hearing for now. If the parties enter into an agreement the parties will reach out to the Court to convert it to a plea hearing.

2. In light of the continuing plea discussions, the defendant agrees that it is in the interests of justice to toll the speedy trial clock until the date of the next status hearing. Specifically, Defendant agrees that time should be excluded pursuant to 18 USC 3161(h)(7)(A), (B)(i), (ii), and (iv) in the interests of justice. Defendant also agrees that those interests outweigh the interests of the public and the defendant in a speedy trial in order to give the defendant and defense counsel time to discuss an anticipated plea offer extended by the government and to decide how to proceed in this case. If convenient to the Court, the parties propose that the next status hearing be scheduled for the next available date in two to three weeks from today.

Wherefore, the government and defendant respectfully request that the status hearing be rescheduled for a date approximately two to three weeks from today that is convenient to the Court and the parties.

Respectfully submitted,

Dated: November 1, 2021

/s/ Sydney Tombers

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ORDER

Upon consideration of the Joint Motion to Continue Hearing, and for good cause shown, it is hereby:

ORDERED, that the motion is granted and the status hearing set for November 3, 2021, is vacated; and it is

FURTHER ORDERED, that the Court finds pursuant to 18 USC 3161(h)(7)(A), (B) (i), (ii), and (iv) it is in the interests of justice to toll the speedy trial clock until the date of the next status hearing in order to enable the parties to continue plea negotiations and the discovery process; and it is

FURTHER ORDERED, that the parties shall appear for a hearing on November _____, 2021, at _____ a.m./p.m.

SO ORDERED.

Dated: November ____ 2021

RUDOLPH CONTRERAS
United States District Judge