

**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 22, 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.

Additionally, discovery for this case is still being provided and counsel would request time to review it before entering into a plea agreement. 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 review discovery and continue negotiating 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 a date the week of December 16-17, as both parties have availability on their calendars those dates.

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 19, 2021

/s/ Sydney Tombers

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CR. NO. 21-371 (RC)

**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 22, 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 December \_\_\_\_\_, 2021, at \_\_\_\_\_ a.m./p.m.

**SO ORDERED.**

Dated: November \_\_\_\_ 2021

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RUDOLPH CONTRERAS  
United States District Judge