

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

UNITED STATES OF AMERICA :
 :
 v. : **Crim. No. 21-CR-127 (ABJ)**
 :
JOSHUA BLACK, :
 : *Defendant.* :

**JOINT MOTION TO CONTINUE STATUS CONFERENCE AND GOVERNMENT'S
UNOPPOSED MOTION TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

The United States of America, by and through the United States Attorney for the District of Columbia, and Clark U. Fleckinger II, counsel for defendant Joshua Black, respectfully move this Court to continue the status conference set for June 18, 2021, at 10:00 a.m. The government further moves the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act, which counsel for Black does not oppose. In support of the joint motion and the government's unopposed motion, the parties now state the following:

1. On May 26, 2021, the government tendered a plea offer to Black.
2. During the week of June 6, 2021, counsel for the government and Black began discussing the government's plea offer, which raised issues that will require additional conversations to sort out. The parties expect that these plea negotiations will continue, and that Black will need additional time to consider the government's offer beyond the upcoming scheduled status-conference date of June 18, 2021.
3. A continuance of approximately two weeks will foster the parties' negotiations regarding a possible pretrial disposition in this case.

4. On June 14, 2021, counsel for the government and Black corresponded with the Court's courtroom clerk, who advised counsel that the following dates and times may be feasible continuance dates, and these dates and times would also be satisfactory for counsel:

- Wednesday, July 7 – after 2:00 p.m.
- Friday, July 9 – anytime

5. The government also moves the Court to exclude the period from June 18, 2021, until the continuance date from the computation of time under the Speedy Trial Act, 18 U.S.C. § 3161 ("STA"), for the reasons the government articulated in its prior motion to continue and exclude time under the STA (ECF No. 13) and because the continuance will further continued plea negotiations. The government also requests the Court find that the ends of justice served by granting this continuance outweigh the best interests of the public and Black in a speedy trial. Counsel for Black does not oppose this motion to exclude time under the STA.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court GRANT this joint motion to continue the status conference, and the government requests that the Court grant its unopposed motion to exclude the period from June 18, 2021, until the next Court date from the computation of time under the STA.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 14, 2021, I served a copy of this pleading on defendant's counsel through the Court's electronic case files system.

/s/ Seth Adam Meinero

SETH ADAM MEINERO

Trial Attorney

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