

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : Case No: 21-CR-403 (RC)  
 :  
 NICOLE PRADO, :  
 :  
 Defendant. :

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**UNOPPOSED MOTION TO CONTINUE STATUS HEARING**

Comes Now, Nicole Prado, by counsel, and respectfully moves this Court for a 60-day continuance of the above-captioned proceeding, and further to exclude the time within which a trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). As grounds for this motion, Ms. Prado states the following:

1. On July 8, 2021, Ms. Prado was arraigned in the above-captioned case. On that date, the Court granted the government's unopposed motion to continue the case to September 10, 2021 at 12:00 p.m. for status. The Court further granted the government's unopposed request to exclude from the speedy trial clock the time from July 8, 2021 through September 10, 2021, in the interest of justice.
2. At that time, undersigned counsel also informed the Court that Ms. Prado was pregnant and expected to give birth at the end of September, 2021.
3. In early August, 2021, Ms. Prado was treated at a hospital for complications with her pregnancy. Her treating physician placed her on strict bedrest for the duration of her

- pregnancy. Undersigned counsel provided the government with documentation of the hospital visit and strict bedrest orders.
4. In order to ensure the health of Ms. Prado and her unborn child, and for counsel to effectively be able to review, consult and discuss in a meaningful manner with Ms. Prado the discovery provided in this case, she asks this Court to continue the September 10, 2021 status hearing for 60 days and to exclude the time within which a trial must commence under the Speedy Trial Act, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7) (A), (B)(i), (ii), and (iv).
  5. The government does not oppose this request.

Respectfully submitted,

\_\_\_\_\_  
/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of August, 2021, I will electronically file the foregoing Motion to Continue with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Joan Robin

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 **Defendant.** :

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**ORDER**

On Motion of the defendant, the Government having consented to the motion, and for good cause shown, the Court hereby ORDERS that the status hearing in the above-captioned case shall be continued until \_\_\_\_\_ at \_\_\_\_\_ a.m.

It is FURTHER ORDERED that the period of time from September 10, 2021 through \_\_\_\_\_ shall be excluded in computing the date for speedy trial under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, in the interest of justice.

It is ORDERED this \_\_\_ day of August 2021.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE