UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : Case No. 21-cr-142-CJN

:

SAMUEL FISHER

:

Defendant.

JOINT MOTION TO CONTINUE CHANGE-OF-PLEA HEARING, AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

Defendant Samuel Fisher, through counsel, and the U.S. Attorney for the District of Columbia respectfully and jointly move to continue the change-of-plea hearing scheduled for June 23, 2022, to a date on or after July 5, 2022, and to exclude time under the Speedy Trial Act between June 23, 2022, and the next scheduled date. The government has authorized defense counsel to file this motion on behalf of both parties.

In support of this motion, the parties state the following.

At the parties' joint request, the Court vacated the scheduled May 5, 2022, status hearing, and scheduled a change-of-plea hearing. Defense counsel has a plea hearing previously scheduled for June 23, 2022, at 2 pm, which is the same date and time the Court scheduled the change-of-plea hearing for Mr. Fisher.

Given the scheduling conflict, and the need to arrange for a date when the defendant, incarcerated in New York, can enter his guilty plea in this case, the parties submit that the ends of justice served by the requested continuance outweigh the interest of the public and the defendant in a speedy trial, and therefore request that the time between June 23, 2022, and the next hearing date be excluded under the Speedy Trial Act.

Both parties are available the week of July 5, except NOT available on July 8, 2022.

A proposed order is attached.

Respectfully submitted,

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