

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
WASHINGTON, D.C.

UNITED STATES OF AMERICA

v.

WILLIAM MCCALL CALHOUN, JR.
Defendant.

CRIMINAL CASE NO.
1:21-CR-00116-DLF

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE &
ARRAIGNMENT, OR IN THE ALTERNATIVE, MOTION TO
ADVANCE STATUS CONFERENCE & ARRAIGNMENT**

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through undersigned counsel, Jessica N. Sherman-Stoltz, and without opposition of the Assistant United States Attorney, and hereby files this motion to briefly continue his February 1, 2022 status conference and arraignment, or in the alternative, advance his February 1, 2022 status conference and arraignment. For just and good cause, Defendant states the following:

1. Defendant's next status conference was previously scheduled for February 1, 2022, at 11 A.M., via video.
2. Defendant is counsel for a murder trial that has now been advanced to the number one spot for the week of January 30, 2022 (State v. Deontrey Parker, Case No.: 19CR-038). Defendant expects this trial to go forward and is likely to last the entirety of the week of January 30th.

3. Defendant is aware that the Government recently filed a superseding indictment in his case, which is also scheduled for arraignment on February 1st.
4. Defendant requests a brief continuance of his upcoming status conference and arraignment, until after Friday, February 4, 2022, or in the alternative, due to the Court's need to promptly arraign him on the recently filed superseding indictment, and with the availability of the Court and all other parties, Defendant requests his status conference and arraignment be advanced to the week of January 24, 2022.
5. Defendant agrees that any delay caused by the granting of this motion shall be excluded in computing the date for a speedy trial in this case.

WHEREFORE, Defendant respectfully requests that the Court grant his unopposed motion to continue his February 1, 2022 status conference and arraignment, or in the alternative, and with the availability of the Court and all other parties, advance his February 1, 2022 status conference and arraignment.

A proposed Order is included.

Respectfully submitted, this 18th day of January 2022.

/s/ Jessica N. Sherman-Stoltz
JESSICA N. SHERMAN-STOLTZ, ESQ.
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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 18th day of January 2022, a true and correct copy of the foregoing *Unopposed Motion to Continue, or the in the Alternative, to Advance* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz
Jessica N. Sherman-Stoltz, Esq.
Virginia State Bar #90172
Sherman-Stoltz Law Group, PLLC.