

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

<b>UNITED STATES OF AMERICA</b>	:
	:
v.	:
	:
<b>NICHOLAS REIMLER,</b>	:
<b>Defendant.</b>	:

**CRIMINAL NO. 21-CR-239 (RDM)**

**CONSENT MOTION TO CONTINUE THE STATUS HEARING AND TO EXCLUDE  
TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this consent motion to request the status hearing in this matter set for March 31, 2021, be continued to May 14, 2021, and to exclude time under the Speedy Trial Act between March 31, 2021 and May 14, 2021. The Government and the defendant agree that there is good cause to exclude time in this case from March 31, 2021 and May 14, 2021. Defendant concurs in this request and agrees that it is in his best interest. In support thereof, the government states as follows:

1. The government and counsel for the defendant have conferred, and are continuing to communicate in an effort to reach a pre-trial resolution of this matter. The government also needs to provide additional discovery to counsel for the defendant, and counsel for the defendant will need time to review discovery. The parties agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial detention or pretrial release.
2. The parties, therefore, would respectfully request that the status hearing in this matter be continued until May 14, 2021. The parties further request that the time between

March 31, 2021, and May 14, 2021, be excluded from the period allowed under the Speedy Trial Act for the government to commence a trial. The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from March 31, 2021 through May 14, 2021, shall be excluded in computing the date for speedy trial in this case.

Wherefore, the parties respectfully request that the Court continue the status hearing in this matter until May 14, 2021, and exclude time under the Speedy Trial Act between March 31, 2021 and May 14, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY  
D.C. BAR NO. 415793

By: /s/ Janani Iyengar  
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**UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CRIMINAL NO. 21-MJ-239 (RDM)</b>
	:	
<b>NICHOLAS REIMLER,</b>	:	
<b>Defendant.</b>	:	

**ORDER**

This matter having come before the Court pursuant to a Motion to Continue the Status Hearing and Exclude Time, upon consent, it is therefore

ORDERED that, after taking into account the public interest in the prompt disposition of criminal cases, good cause exists to continue the status hearing in this matter until May 14, 2021; it is

FURTHER ORDERED that the period from March 31, 2021 to May 14, 2021 be excluded from computing the time within which a trial must commence under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the best interests of the public and Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7). The Court finds that the parties need additional time to reach a pre-trial resolution and to review discovery material.

It Is So Ordered.

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Randolph D. Moss  
United States Magistrate Judge

Entered: \_\_\_\_\_