

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-cr-155 (ABJ)**
 :
JACOB HILES, :
 Defendant. :

JOINT MOTION TO CONTINUE STATUS HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Jacob Hiles, respectfully move this Honorable Court to continue the status hearing currently scheduled for April 30, 2021, to a date in approximately 30 days, with time excluded under the Speedy Trial Act in the interests of justice.

In support of this motion, the parties submit that:

1. The government expects substantial discovery to be made available to the defense shortly.
2. The parties wish to engage in plea discussions.
3. The report filed by the Pretrial Services Agency on April 28, 2021, indicates the defendant is in compliance and requests no change in conditions.
4. A continuance of approximately thirty days will allow discovery to be reviewed and plea discussions to occur.
5. The parties are available for a status hearing the week of May 24, 2021, specifically May 26, 2021, after 11 am, May 27, 2021, after 1 pm, and any time on May 28, 2021.
6. The parties agree that the interests of justice will be served by excluding time and outweigh the defendant's and the public's interest in a speedy trial.

WHEREFORE, the parties respectfully ask this Court to continue the status hearing currently scheduled for April 30, 2021, to a date the week of May 24, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

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Counsel to the Defendant

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[PROPOSED] ORDER

Upon consideration of the Joint Motion to Continue Status Hearing, it is this ____ day of April, 2021, HEREBY ORDERED that:

- The Motion is GRANTED;
- The status hearing currently scheduled for April 30, 2021, is CONTINUED to May ____, 2021; and
- The interests of justice outweigh the defendant and the public’s interest in a speedy trial such that the time from April 30, 2021, to May ____, 2021, shall be excluded under the Speedy Trial Act.

SO ORDERED.

HON. AMY BERMAN JACKSON
UNITED STATES DISTRICT JUDGE