

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-cr-203 (JDB)**
 :
ALEXANDER SHEPPARD, :
 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, Alexander Sheppard, respectfully move this Honorable Court to continue the status hearing currently scheduled for June 1, 2021, to a date in approximately forty-five to sixty 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's review of the evidence in the case is ongoing.
2. The government expects substantial discovery to be made available to the defense shortly.
3. The parties wish to engage in plea discussions.
4. The Pretrial Services Agency report filed on May 27, 2021, recommends no change in conditions and reports no violations of the defendant's conditions of release.
5. A continuance of approximately forty-five to sixty days should allow discovery to be produced and plea discussions to occur.
6. The parties are available for a status hearing the week of July 19, 2021.
7. 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 June 1, 2021, to a date the week of July 19, 2021.

Respectfully submitted,

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[PROPOSED] ORDER

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

- The Motion is GRANTED;
- The status hearing currently scheduled for June 1, 2021, is CONTINUED to July ____, 2021; and
- The interests of justice outweigh the defendant and the public's interest in a speedy trial such that the time from June 1, 2021, to July ____, 2021, shall be excluded under the Speedy Trial Act.

SO ORDERED.

HON. JOHN D. BATES
UNITED STATES DISTRICT JUDGE