

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	CASE NO. 21-CR-00370
)	
JENNIFER HEINL)	
)	
Defendant.)	Electronically Filed

MOTION TO CONTINUE STATUS CONFERENCE

AND NOW comes Defendant, Jennifer Heidl, through her attorney, Martin A. Dietz, Esquire, and respectfully moves this Court to continue the status conference scheduled for July 22, 2021 in this case on the following basis:

1. Defendant, Jennifer Heidl (“Ms. Heidl”), was charged by the filing of an information on May 20, 2021 charging her with violations of 18 U.S.C. §1752(a)(1), 18 U.S.C. §1752(a)(2), 40 U.S.C. §5104(e)(2)(D) and 40 U.S.C. §5104(e)(2)(G).

2. Ms. Heidl was arraigned in this case on May 25, 2021 and this Court scheduled a status conference in this case for July 22, 2021.

3. Ms. Heidl respectfully requests that the Court continue the status conference for a period of at least sixty (60) days because the government has advised that it will be making at least two additional voluminous discovery disclosures to Ms. Heidl and Ms. Heidl and the government are continuing discussions concerning the disposition of this case. Undersigned counsel and Ms. Heidl will use the additional time to review of the available discovery materials in order for Ms.

Heinl to make an informed decision as to how to proceed in this case.

4. Granting the requested continuance will preserve Ms. Heinl's constitutional rights to the effective assistance of counsel, due process and a fair trial.

5. Ms. Heinl concedes that all time that elapses from the requested continuance is excludable under the Speedy Trial Act.

6. Counsel for the government, Assistant United States Attorney Frances E. Blake, consents to the requested continuance.

WHEREFORE, Defendant, Jennifer Heinl, respectfully requests that the Court continue the status conference scheduled in this case for July 22, 2021 for a period of at least sixty (60) days.

Respectfully submitted,

s/ Martin A. Dietz
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Jennifer Heinl

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v.)	Criminal No. 21-CR-370
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JENNIFER HEINL,)	
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Defendant.)	

ORDER OF COURT

AND NOW, this _____ day of _____, 2021, upon consideration of the Motion to Continue Status Conference filed by Defendant, Jennifer Heinel, IT IS ORDERED that said motion is GRANTED. IT IS FURTHER ORDERED that a status conference in this case shall occur on _____.

It is further ordered that the Speedy Trial Clock is tolled in this case until _____ and that that the period from July 22, 2021 through _____ be deemed excludable delay under the Speedy Trial Act, 18 U.S.C. §3161 et. seq. because for the reasons stated in defendant’s motion, the Court finds that it is unreasonable to expect adequate preparation for pretrial proceedings and trial within the time limits of the Act and that the extension is reasonably necessary for the defendant and counsel to prepare effectively and the ends of justice served by the continuance outweigh the interest of the public and Defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A), (B)(ii).

Emmet G. Sullivan
United States District Judge

cc: All Counsel of Record