

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-mj-206
	:	
NICHOLAS LENTZ,	:	
	:	
Defendant.	:	

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

The United States of America hereby moves this Court to vacate the status conference presently set for December 20, 2021, and for a 60-day continuance of the above-captioned proceeding, and further to exclude the time within which an information or indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support of its motion, the government incorporates the representations made in its previous unopposed motion to continue and to exclude time under the Speedy Trial Act, ECF Nos. 10 and 12, and states that since that date, the volume of potentially discoverable materials has only grown. The government continues to work diligently to ensure that it meets its discovery obligations. Additionally, the parties are in discussions about a pretrial resolution to this case, and the additional time will allow them to finalize any agreement that may be worked out.

Undersigned counsel has consulted with counsel for Mr. Lentz regarding this motion. Counsel for Mr. Lentz has represented to undersigned counsel that the government may represent to the Court that this motion is unopposed.

WHEREFORE, the government respectfully requests that this Court grant the motion to

vacate the currently scheduled status conference and to continue the matter for 60 days, and that the Court exclude the time within which an information or indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

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