

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-cr-0245 (APM)
SHANE JENKINS)	
)	
Defendant.)	
_____)	

JOINT MOTION TO CONTINUE STATUS CONFERENCE

Shane Jenkins, through undersigned counsel, and joined with the United States Attorney for the District of Columbia, request that the status conference currently scheduled for June 28, 2021 at 10:00 a.m. be continued for 60 days, and time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. In support, the parties submit as follows:

1. On March 2, 2021, Mr. Jenkins was charged via criminal complaint with one count of Assault on Federal Officer in violation of 18 U.S.C. 111(a)(1) , one count of Obstruction of Law Enforcement During Civil Disorder in violation of 18 U.S.C. 231(a)(3), one count of Damage to Federal Property in violation of 18 U.S.C. 1361, and three violations of 18 U.S.C. 1752. See ECF No. 1.
2. On March 5, 2021, Mr. Jenkins was arrested in his home jurisdiction of Houston, Texas. See ECF No. 5 where he was ordered detained pending trial after a detention and preliminary hearing on March 11, 2021. See ECF No. 6.
3. Mr. Jenkins was then transported to the D.C. Jail and was indicted for the above counts on March 24, 2021. See ECF No. 7.
4. On May 13, 2021, Mr. Jenkins requested a bond review, which was denied on May 25, 2021. See ECF No. 5-15. Mr. Jenkins remains in custody at the D.C. Jail. On May 25,

2021, the parties requested a continuance of 30 days and also requested that that time be excluded in computing the date for speedy trial. The parties represented that discovery was provided but that there was still more to produce, including a hard drive containing a large phone extraction. The Court granted the request to continue and a status hearing was set for June 28, 2021.

5. In the interim, counsel has reviewed the discovery produced thus far and Mr. Jenkins is currently 8th on the waiting list to review the currently produced discovery at the jail. Also, the hard drive containing the contents of the defendant's phone was provided, however was not readable by our office because of a formatting issue. The hard drive must be sent back to the government for this issue to be resolved. Lastly, a plea offer was extended by the government on June 3, 2021.
6. The parties request a further continuance in this matter to allow Mr. Jenkins to review his discovery, to allow the parties to resolve the hard drive issue and for counsel to review that hard drive, and to allow time to consider the plea agreement and discuss Mr. Jenkins's options with him.
7. Accordingly, the parties now jointly move this Court to continue the status conference, currently scheduled for June 28 2021, for a period of 60 days. Such a continuance will allow for the continued provision and review of discovery, as well as allow the parties to continue discussions regarding a possible resolution of this matter short of trial.
8. The parties also request that time be excluded from calculation, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, until the date of the continued status conference in this matter. The parties submit that a continuance of approximately 60 days is warranted and

that an order excluding time would best serve the interests and ends of justice and outweigh the interests of the public and defendant in a speedy trial.

WHEREFORE, Mr. Jenkins asks in conjunction with the United States, that this Honorable Court continue the Status Conference currently scheduled for June 28, 2021 at 10:00 a.m. for a period of 60 days, and toll time under the Speedy Trial Act until the new hearing date.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

SHANE JENKINS,

Defendant.

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Cr. No. 21-cr-00245 (APM)

ORDER

Before the Court is a Joint Motion to Continue Status Conference. For the reasons set forth therein, it is hereby

ORDERED that the current status hearing set for 10:00 a.m. on June 28, 2021 be continued to August _____, 2021 at _____ a/p.m.; and it is further

ORDERED that the time between June 28, 2021 and August _____, 2021 be excluded from calculation under the Speedy Trial Act. The Court finds that the ends of justice served by the granting of such continuance outweigh the best interests of the public and Defendant in a speedy trial, as the continuance will provide the parties with additional time to engage in the discovery process and pretrial negotiations.

DATE:

Amit P. Mehta
United States District Judge