

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	CRIMINAL CASE NO.
)	1:21-CR-00346-BAH-1
GLEN MITCHELL SIMON)	

UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE

COMES NOW the Defendant, GLEN MITCHELL SIMON, by and through undersigned counsel and respectfully requests a continuance of the status conference in this case. A status conference is scheduled for June 25, 2021. Counsel asks for a 30-day continuance of the conference. In support of this Motion, Defendant shows as follows:

1.

After being charged in a criminal complaint from this district, Mr. Simon was arrested in the Northern District of Georgia and made his initial appearance there on May 5, 2021. (CM/ECF for N.D. Ga., Case no. 2:21-mj-09 at Docs. 1, 4). The magistrate judge held a detention hearing, and Mr. Simon was released on conditions of supervision. (CM/ECF for N.D. Ga., Case no. 2:21-mj-09 at Docs. 6, 7, 8). A criminal information was thereafter filed in this district. (Doc. 6).

Mr. Simon was arraigned on the information on May 12, 2021, and was ordered to remain under the same conditions of release. (Doc. 16). He resides in

the Northern District of Georgia, and is subject to supervision by federal probation officers there. He has not had any issues or violations while on pretrial release.

2.

The Court held an initial status conference on May 14, 2021, and issued a scheduling order that, *inter alia*, scheduled a status conference for June 25, 2021. The status conference was scheduled to occur after Mr. Simon's deadline for filing discovery motions.

Counsel subsequently requested a 30-day continuance of the deadline for filing motions, which the Court has granted. (Doc. 18). The new deadline for filing motions is July 16, 2021. The parties are in communication regarding the discovery, and there are no matters Mr. Simon intends to raise at a status conference prior to the filing of any discovery motions. Accordingly, he requests that the conference be continued until after the new deadline for filing motions. This is Mr. Simon's first request for a continuance of a status conference.

3.

Counsel has conferred with Assistant United States Attorney ("AUSA") Amy Larson and AUSA Laura Hill regarding this continuance, and they have no objection to this motion.

4.

Under 18 U.S.C. § 3161 et seq., the interests of justice in granting the continuance outweigh the public's and the Defendant's right to a speedy trial. Thus, the time between now and the new date of the status conference should be excluded from speedy trial calculations.

WHEREFORE, Mr. Simon respectfully requests a 30-day continuance of the status conference in this case. A proposed Order is attached.

Dated: This 21st day of June, 2021.

Respectfully Submitted,

/s/ Rebecca Shepard

Rebecca Shepard

Georgia Bar No. 780692

Attorney for Glen Simon

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Unopposed Motion to Continue Status Conference has been formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1B, and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following counsel of record:

Amy Larson, Esq.
Laura Hill, Esq.
Assistant United States Attorney
555 4th Street, NW
Washington, DC 20530

Dated: This 21st day of June, 2021.

/s/ Rebecca Shepard
Rebecca Shepard
Georgia Bar No. 780692
Attorney for Glen Simon

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ORDER

The Court finds that, in light of Mr. Simon's prior motion to continue the deadline for filing discovery motions, it was necessary to continue the status conference. The Court finds that the interests of justice in continuing the status conference substantially outweigh the interests of the public and defendant in the speedy resolution of this matter, and thus the Clerk is directed to count as excludable any delay occurring in continuing the status conference. 18 U.S.C. § 3161, *et seq.*

IT IS HEREBY ORDERED that the status conference will be held on _____, 2021.

SO ORDERED, this ____ day of _____, 2021.

HON. BERYL A. HOWELL
UNITED STATES DISTRICT JUDGE

Proposed Order Submitted By:
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