

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

UNITED STATES OF AMERICA :
 :
v. : **Case No. 1:21-CR-00240-BAH**
 :
 :
LAWRENCE EARL STACKHOUSE, :
 :
 :
 :
 :
Defendant. :

**JOINT MOTION TO CONTINUE SEPTEMBER 24, 2021
STATUS CONFERENCE FOR 60 DAYS**

The United States of America, through counsel, and Defendant Lawrence Earl Stackhouse, through counsel, hereby move this Court to grant its Joint Motion to Continue September 24, 2021 Status Conference for 60 days. The Government and Defendant further move the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the parties state as follows:

1. On May 21, 2021, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties, and that the Government would continue to supplement discovery.
2. On July 20, 2021 the Court continued a Status Conference in this case as the Government continued to supplement discovery.
3. The Government has continued to supplement discovery.
4. The parties have discussed the possibility of pretrial resolution of case, but have not decided upon the parameters of a plea agreement. This is a continuing discussion.
5. On September 20, 2021, counsel for Defendant and the United States agreed that the Court's Status Conference, which is set for September 24, 2021, should be continued for

CHANNING PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By: /s/ April H. Ayers-Perez
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CERTIFICATE OF SERVICE

On this 20th day of September 2021, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ April H. Ayers-Perez
April H. Ayers-Perez
Assistant United States Attorney