

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

UNITED STATES OF AMERICA :
 :
 v. : **CRIMINAL NO. 21-cr-492**
 :
 JEREMY GRACE, :
 Defendant. :

**JOINT STATUS REPORT AND CONSENT MOTION TO
CONTINUE AND TOLL SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this Joint Status Report and Consent Motion to File Another Joint Status Report with the Court and/or Hold a Status Conference on January 17, 2022, and to Toll Speedy Trial Act from November 15, 2021, until January 17, 2022. The Government and the defendant agree that there is good cause to toll the Speedy Trail Act and exclude time from November 15, 2021, to January 17, 2022. Defendant concurs in this request and agrees that it is in his best interest. Defendant has reviewed this motion and agrees to the January 17, 2022, date. In support thereof, the government states as follows:

1. The government and counsel for the defendant have conferred and are actively communicating in an effort to resolve this matter.
2. The government has provided voluminous discovery to defense counsel and anticipates producing additional discovery in the coming weeks. This includes cell phone extractions, full search warrant returns for cell site location information, various videos, CCTV, and other discovery. The defense is continuing to review the discovery.
3. The parties agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial release.

4. The parties jointly ask that they be allowed to file another joint status report with the Court and/or hold a status conference on or before January 17, 2022, to update the Court further on the status of this matter.
5. The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from November 15, 2021, through January 17, 2022, shall be excluded in computing the date for speedy trial in this case.

Dated: November 12, 2021

Respectfully submitted,

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ORDER

This matter having come before the Court pursuant to a Joint Status Report and Consent Motion to Continue and to Toll Speedy Trial Act, it is therefore

ORDERED that good cause exists to extend the time for the filing of an additional status report and/or to hold the next status conference.

ORDERED that the period from November 15, 2021 through January 17, 2022, shall be excluded computing the time under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. §§ 3161(h)(1) & (h)(7). The Court finds that COVID-19 has presented complications here that make it difficult for defense to meet with his client and prepare, that there is voluminous and evolving discovery, and that delay is necessary for the parties to work on a potential resolution.

It Is So Ordered.

Randolph Ross
United States District Court Judge

Entered: _____