

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

**UNITED STATES OF AMERICA,** )  
 )  
 **v.** ) **No. 21-cr-93 (RC)**  
 **JOHN ANDRIES** )  
 )  
 **Defendant.** )  
 \_\_\_\_\_ )

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE**

John Andries, through undersigned counsel, requests that the status conference currently scheduled for September 15, 2021 at 10:30 a.m. be continued for two weeks and time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. In support, the counsel submits as follows:

1. On January 28, 2021, Mr. Andries was charged via criminal complaint with misdemeanor charges arising out of events on January 6, 2021 and an Information was filed alleging the same charges on February 8, 2021. *See* ECF No. 1, 5.
2. On May 26, 2021, the government filed a Superseding Indictment adding one felony count of 18 U.S.C. §1512(c)(2). *See* ECF No. 15.
3. The parties appeared for a status conference on July 19, 2021, where the Court set a briefing schedule on defendant’s motion to dismiss.
4. The defendant filed his motion to dismiss on August 13, 2021 and the government filed their response on September 2, 2021. Mr. Andries filed his reply on September 13, 2021.
5. In the interim, Mr. Andries has been on pre-trial release and has been compliant with all of his conditions.

6. Undersigned counsel proposes to continue this status conference set for September 15, 2021 to allow the parties to prepare for a motions hearing. The issues set forth in the government's response and defense reply are complex and the parties anticipate the Court will have questions for counsel. Undersigned counsel requests two weeks to prepare for a motions hearing.
7. Undersigned counsel discussed this request with Mr. Andries, who consents to this continuance as well as with the government, who does not oppose a two week continuance.
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 two weeks 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. Andries requests that this Honorable Court continue the Status Conference currently scheduled for September 15, 2021 at 10:30 a.m. for a period of two weeks and toll time under the Speedy Trial Act until the new hearing date. The parties have conferred and are both available on either October 4 or October 5 if those days are available to the Court.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

\_\_\_\_\_  
/s/  
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**Cr. No. 21-cr-0093 (RC)**

**ORDER**

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

**ORDERED** that the current status hearing set for 10:30 a.m. on September 15, 2021 be continued to October \_\_\_\_\_, 2021 at \_\_\_\_\_ a/p.m.; and it is further

**ORDERED** that the time between September 15, 2021 and October \_\_\_\_\_, 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.

DATE:

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Rudolph Contreras  
United States District Judge