

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>Cr. No. 21-mj-158 (ZMF)</b>
	:	
<b>CHRISTOPHER W. ORTIZ,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

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**JOINT MOTION TO CONTINUE THE PRELIMINARY HEARING  
AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, by and through his attorney, Dani Jahn, Esquire (collectively, “the Parties”), respectfully submit this joint motion to continue the preliminary status hearing set for January 20, 2022, at 10 a.m. and exclude time under the Speedy Trial Act, and state as follows:

1. On November 10, 2021, the parties filed a joint motion to continue the preliminary hearing and requested an exclusion of time under the speedy trial act, which was granted on November 12, 2021. *See* ECF #20 and #21. A preliminary hearing is currently scheduled for January 20, 2022, at 10 a.m. *Id.*
2. Since that filing, the parties have been discussing the case and the government’s plea offer which will be put in writing and submitted to defense counsel in the coming weeks.
3. Therefore, further time is needed in order to exhaust those discussions and any potential resolution of this matter. The parties request an approximate 60 day continuance.

WHEREFORE, the parties respectfully request that this Court issue an Order continuing the Preliminary Hearing scheduled for January 20, 2022, at 10 a.m. and excluding all time from the calculation of time pursuant to the Speedy Trial Act under 18 U.S.C. § 3161(h)(7)(A) from

January 20, 2022, until the next hearing in this matter.

Respectfully submitted,

MATTHEW M. GRAVES  
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\_\_\_\_\_/s/\_\_\_\_\_  
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