

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No: 1:21-CR-86-PLF
	:	
ROBERT SANFORD	:	
	:	
Defendant.	:	

**CONSENT MOTION TO CONTINUE STATUS HEARING AND FOR
EXCLUDABLE DELAY**

The defendant, Robert Sanford, by and through undersigned counsel, respectfully files this Consent Motion to Continue the Status Hearing in the above-captioned matter from October 14, 2021, until January 13, 2022. The Government and the defendant agree that there is good cause to exclude time under the Speedy Trial Act from October 14, 2021, until January 13, 2022. The government concurs in this request and agrees that it is in its best interest. In support thereof, the defendant states as follows:

1. The government and undersigned counsel conferred and continue to communicate in an effort to resolve this matter short of trial.
2. The parties, therefore, would respectfully request that the status hearing and the date by which an information or a trial must commence be continued until January 13, 2022. 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 October 14, 2021, through January 13, 2021, shall be excluded in computing the date for speedy trial in this case.

Wherefore, the parties respectfully request that the Court continue the status hearing in this matter until January 13, 2021.

Respectfully submitted,

Robert Sanford

By: /s/ Andrew M. Stewart.
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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of October, 2021, I electronically filed the foregoing motion with the clerk of the court using the CM/ECF system, which will send an electronic copy to the following:

Janani Iyengar
Assistant United States Attorney
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ORDER

This matter having come before the Court pursuant to a Motion to Continue, upon consent, it is therefore

ORDERED that, after taking into account the public interest in the prompt disposition of criminal cases, good cause exists to continue the currently scheduled status hearing for October 14, 2021, to January 13, 2022; it is

FURTHER ORDERED that the period from October 14, 2021, to January 13, 2022, be excluded from computing the time within which a trial must commence under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the best interests of the public and Defendant in a speedy trial. *See* 18 U.S.C. ' 3161(h)(7). The Court finds that the parties are in discussions to reach a pre-trial resolution and to discuss discovery matters.

It Is So Ordered.

PAUL L. FRIEDMAN
United States District Judge

Entered this ____ day of August 2021.