

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

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 1:21-cr-00570-APM
v.	:	
	:	
LANDON KENNETH COPELAND,	:	
	:	
Defendant.	:	

JOINT MOTION TO CONTINUE

The United States of America, by and through its undersigned counsel, and joined with the defendant, request that the status conference currently scheduled for March 30, 2022, be continued for approximately 30 days, and time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. In support of this request, the parties submit as follows:

1. The parties last appeared before the Court for a status conference on December 22, 2021. At that status conference, the defendant requested a status conference approximately 90 days out to review the discovery with the defendant and to discuss a potential resolution of the matter.
2. Since the December 22, 2021, status hearing, the parties have had several discussions regarding the evidence in the case and the potential for a pretrial resolution. Those discussions remain ongoing. While the parties anticipate that they can be completed soon, and that they therefore will know soon whether this matter can be set for trial, the parties agree that both sides need additional time for discussion and consideration of the other side’s proposals.
3. The parties request a further continuance in this matter so that these discussions can continue. If this matter is set for trial, ongoing discussions will be made more difficult by, among other things, the need to transport the defendant from Utah to the District of Columbia to stand trial. A continuance of approximately 30 days will allow the parties to conclude negotiations and

schedule the matter efficiently going forward.

4. The parties propose that the matter be continued to April 28, 2022. Ms. Shaner has a conflict at 10 a.m. Eastern Time but the parties are otherwise available throughout that day.

4. 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 approximately 30 days 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 pursuant to the factors described in 18 U.S.C. §3161(h)(7)(A), (B)(i), (ii), and (iv).

WHEREFORE, the parties request that this Court continue the Status Conference currently scheduled for March 30, 2022, to April 28, 2022, or a similar date at the Court's convenience, a period of 30 days. The parties further request that the Court and toll time under the Speedy Trial Act until the new hearing date.

Respectfully submitted,

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