

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21-cr-410**
 :
ANTON LUNYK, :
 :
 Defendant.: :

**MOTION TO VACATE, CONTINUE, AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America hereby moves this Court to vacate the April 8, 2022, status hearing in the above-captioned matter, to set this matter for a virtual plea hearing in two to four weeks, and to exclude the intervening time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). In support of its motion, the government states as follows:

The parties appear to have reached an agreement regarding pretrial resolution of this case and are working to finalize plea paperwork. Further, counsel for the defendant recently tested positive for COVID-19, and thus will not be able to meet with his client in person until after his isolation period has concluded. Counsel for the defendant would like his client to be physically present at counsel's office for any virtual plea hearing.

The United States conferred with counsel for each defendant regarding this motion and counsel for defendants Lunyk, Connor, and Ferrigno have each indicated no objection to this motion.

