

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 DANIEL PHIPPS )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

Case No. 21-CR-44 (CJN)

**UNOPPOSED MOTION TO CONTINUE STATUS HEARING**

Defendant, Daniel Phipps, through undersigned counsel, respectfully requests that the April 21, 2022, Status Hearing in this case be continued. In support of this request, the Defendant states:

1. The Defendant's next Status Hearing is presently scheduled for April 21, 2022.
2. The parties are finalizing a pre-trial resolution of this matter and need an additional 30 days to complete those discussions. The Defendant therefore requests that the Court continue the presently scheduled Status Hearing until the week of May 9, 2022. Mr. Phipps further requests, based on the representations above, that the time period from April 21, 2022, until the next scheduled hearing date in this case be excluded under the under the Speedy Trial Act.
3. The Government, per Assistant United States Attorney Michael Liebman, does not oppose this request.

Respectfully submitted,  
A.J. Kramer  
Federal Public Defender

/s/

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