

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-301 (TJK)
	:	
STEPHEN HORN,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE STATUS CONFERENCE AND GOVERNMENT’S
UNOPPOSED MOTION TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT
(2nd Joint Motion)**

The United States of America, by and through the United States Attorney for the District of Columbia, and counsels for Defendant Stephen Horn (“Defendant”) hereby moves this Court to continue the status conference set for December 1, 2021, at 10:00 a.m. for a 90-day period. The Government further moves the Court to exclude the period of the continuance from the computation of 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), which counsel for Horn does not oppose. In support of its motion, the parties state the following:

1. Defendant considered the Government’s July 2, 2021 plea offer. After extensive consideration, Defendant rejected the offer and counteroffered, which the Government rejected.
2. On October 8, 2021, the undersigned counsel filed a notice of substitution on behalf of the Government.
3. The Government has continued to provide Defendant with voluminous discovery.

4. On October 21, 2021, the parties conferred regarding the voluminous discovery and available discovery databases. The parties agreed that based on the additional voluminous discovery a continuance was necessary for the parties to review the discovery material prior to trial.

5. The Government also moves the Court to exclude the period from December 1, 2021, until the continuance date from the computation of time under the Speedy Trial Act, 18 U.S.C. § 3161, for the reasons the Government articulated in the prior motions (ECF No. 15). The Government also requests the Court find that the ends of justice served by granting his continuance outweigh the best interests of the public and Defendant in a speedy trial. Counsels for Defendant do not oppose this motion to exclude time under the Speedy Trial Act.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court GRANT this second joint motion to continue the status conference, and the government requests that the Court grant its unopposed motion to exclude the period from December 1, 2021, until the next Court date from the computation of time under the Speedy Trial Act.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Undersigned counsel for the Government hereby certifies that on November 5, 2021, undersigned counsel served a copy of this pleading on all parties to this matter through the Court's electronic case files system, and that Marshall Ellis and Charles R. Haskell, counsels for Defendant have authorized me to file this joint motion.

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