

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-157 (TNM)
v.	:	
	:	
CHRISTIAN SECOR,	:	
	:	
Defendant.	:	

JOINT MOTION TO EXCLUDE TIME FROM SPEEDY TRIAL CALCULATIONS

The United States of America and defendant Christian Secor, by and through his counsel, respectfully move to exclude time under 18 U.S.C. 3161(h)(7)(A) from the Speedy Trial Act calculations in this case. The parties request that the pretrial conference set for January 10, 2022, be converted to status hearing, and that time under the Speedy Trial Act be excluded from November 29, 2021 until January 10, 2022. The exclusion of time will serve the ends of justice as the parties continue to engage in the discovery process, review the voluminous materials associated with the case, and discuss possible dispositions of the case short of trial.

WHEREFORE, the parties respectfully request this Court issue an order converting the pretrial conference on January 10, 2022 to a status hearing and excluding time under the Speedy Trial Act from November 29, 2021 to January 10, 2022.

Respectfully submitted,

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