

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	No. 21-CR-690 RCL
PHILIP SEAN GRILLO,)	
)	
Defendant.)	
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JOINT MOTION TO CONTINUE STATUS CONFERENCE AND TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT

The United States, jointly with counsel for the defendant, hereby files this motion to adjourn the status conference, currently set for July 26, 2022, in the above-captioned matter, for approximately 45 days, until Tuesday, September 8, 2022. The parties request the additional time to engage in plea negotiations and review additional discovery productions which are ongoing and voluminous.

The parties request that the Court exclude the time until the status conference on September 8, 2022, pursuant to 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).

Respectfully submitted,

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/s/ Christopher M. Cook
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