IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**Case No: 1:21-CR-86-PLF**
	:	
ROBERT SANFORD	:	
	:	
Defendant.	:	

CONSENT MOTION TO CONTINUE STATUS HEARING AND FOR EXCLUDABLE DELAY

The defendant, Robert Sanford, by and through undersigned counsel, respectfully submits this Consent Motion to Continue the Status Hearing in the above-captioned matter from April 13, 2022, and reset the matter to August 2, 2022, for Change of Plea Hearing. The Government and the defendant agree that there is good cause to exclude time under the Speedy Trial Act from April 13, 2022, until August 2, 2022. The government concurs in this request and agrees that it is in its best interest. In support thereof, the defendant states as follows:

1. The parties have reached a plea agreement in this matter.
2. The parties, therefore, would respectfully request that the status hearing and the date by which an information or a trial must commence be continued until August 2, 2022, for a change of plea hearing due the parties trial schedules.
3. Therefore, "the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial," 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from January 13, 2022, until March 10, 2022, shall be excluded in computing the date for speedy trial in this case.

Wherefore, the parties respectfully request that the Court continue the status hearing in this

matter until August 2, 2022, for a Change of Plea Hearing.

Respectfully submitted,

Robert Sanford

By: /s/ *Andrew M. Stewart* .

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of April, 2022, I electronically filed the foregoing motion with the clerk of the court using the CM/ECF system, which will send an electronic copy to the following:

Janani Iyengar
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U.S. Attorney's Office, Eastern District of Virginia
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By: /s/ *Andrew M. Stewart* .
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ORDER

This matter having come before the Court pursuant to a Motion to Continue, upon consent, it is therefore

ORDERED that, after taking into account the public interest in the prompt disposition of criminal cases, good cause exists to continue the currently scheduled status hearing for April 13, 2022, to August 2, 2022, for a Change of Plea Hearing; it is

FURTHER ORDERED that the period from April 13, 2022, to August 2, 2022, be excluded from computing the time within which a trial must commence under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the best interests of the public and Defendant in a speedy trial. *See* 18 U.S.C. §3161(h)(7). The Court finds that the parties are in discussions to reach a pre-trial resolution and to discuss discovery matters.

It Is So Ordered.

_____
PAUL L. FRIEDMAN
United States District Judge

Entered this ____ day of April 2022.