

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 21-MJ-465</b>
	:	
<b>DILLON COLBY HERRINGTON,</b>	:	
<b>Defendant.</b>	:	
	:	

**UNOPPOSED MOTION TO CONTINUE AND EXCLUDE TIME  
UNDER THE SPEEDY TRIAL ACT**

The United States of America and defendant Dillon Colby Herrington hereby move this Court for an additional 45-day continuance of the April 26, 2022, status hearing scheduled in the above-captioned matter, and further to exclude the time within which the trial must commence 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). In support of its motion, the government states as follows:

- The defendant previously asked for a 30-day adjournment of the status conference in order to negotiate a resolution of this matter with the government in lieu of an indictment of felony charges.
- Since that time, the government has determined that it will seek felony charges, and plans to present an indictment to the grand jury. The parties therefore believe it is in the interests of justice to adjourn the status conference to give the government time to present the case to the grand jury. The government and defendant will continue to attempt a resolution of this matter post-indictment.

WHEREFORE, the government respectfully requests that this Court grant a 30-day continuance of the April 26, 2022, status hearing scheduled in the above-captioned matter, and that the Court exclude the time within which the trial must commence 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), for the reasons detailed above.

Respectfully submitted,

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