

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JEFFREY GRACE,

*Defendant.*

Case No. 21-cr-296 (RDM)

MOTION TO CONTINUE

Mr. Jeffrey Grace currently has a hearing scheduled for November 17, 2022. Mr. Grace, through counsel, respectfully requests a continuance until December 20, 2022. The parties have conferred with the Courtroom Deputy and confirmed the Court's availability for this day. The Government has no objection to this request.

The parties are still in the process of finalizing an agreement to resolve this matter prior to trial. Counsel, however, require additional time to complete those discussions and resolve any outstanding issues.

Mr. Grace, through counsel, has no objection to exclusion of time under the Speedy Trial Act until the date of the next hearing.

Given the ongoing issues with the COVID-19 pandemic, Mr. Grace respectfully request the Court conduct the next hearing via video-conference pursuant to the CARES Act and Criminal Procedure Rule 43(B). Mr. Grace is 63 years old and resides in the Pacific Northwest. An in-person hearing will require substantial air travel placing him and others he subsequently encounters at risk of contracting the deadly

virus.

For the aforementioned reasons, Mr. Grace respectfully requests the Court grant this continuance and conduct the next hearing via video-conference.

Respectfully submitted,

A. J. Kramer  
Federal Public Defender

*/s/*  
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