UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERIC	A,)
Pla	intiff;)
v.) Case No. 21-CR-541 (PLF)
FI DUONG,	fendant.)

MOTION TO CONTINUE

For the reasons stated below, Mr. Duong requests and the government has no objection to a two-week continuance of the March 30, 2023 status conference.

The parties have (in principle) reached an agreement but need two additional weeks to finalize matters. To that end, Mr. Duong agrees that the time between March 30, 2023, and next date set by the Court, be excluded under the Speedy Trial Act; Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial, because it will allow the parties to reach a disposition.

Respectfully submitted,

A. J. Kramer Federal Public Defender for the District of Columbia

/s/Michelle Peterson, Chief Assistant Public Defender

Sabrina Shroff Attorney 80 Broad Street, 19th Floor New York, New York 10004

Dated: March 28, 2023