

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:
	:
v.	: CRIMINAL NO. 21-CR-86
	:
ROBERT SANFORD,	:
Defendant.	:

**CONSENT MOTION TO CONTINUE PLEA HEARING AND EXCLUDE TIME UNDER  
THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this Consent Motion to Continue the Plea Hearing in the above-captioned matter from September 8, 2022, until September 23, 2022, at 2:00 PM. The Government and the defendant agree that there is good cause to exclude time under the Speedy Trial Act from September 8, 2022, until September 23, 2022. Defendant concurs in this request and agrees that it is in his best interest. In support thereof, the government states as follows:

1. Defense counsel was unable to appear for the September 8, 2022, date due to illness.
2. The parties, therefore, would respectfully request that the status hearing and the date by which a trial must commence be continued until September 23, 2022. The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). 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 September 8, 2022, through September 23, 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 September 23, 2022

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY

By: /s/ Janani Iyengar  
Janani Iyengar  
Assistant United States Attorney  
NY State Bar No. 5225990  
U.S. Attorney's Office  
555 4th Street, N.W.  
Washington, D.C. 20530  
202-252-7760  
[Janani.iyengar@usdoj.gov](mailto:Janani.iyengar@usdoj.gov)

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<b>Defendant.</b>	:

**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 September 8, 2022, to September 23, 2022; it is

FURTHER ORDERED that the period from September 8, 2022, to September 23, 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.

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PAUL L. FRIEDMAN  
United States District Judge

Entered: \_\_\_\_\_