

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

UNITED STATES OF AMERICA

vs.

**CLEVELAND GROVER
MEREDITH, JR.**

Defendant

Crim. No. 1:21-cr-00159 (ABJ)

**JOINT MOTION FOR STATUS HEARING AND TO EXCLUDE
SPECIFIED TIME UNTIL HEARING UNDER SPEEDY TRIAL ACT**

The United States and Defendant Cleveland Grover Meredith, Jr. hereby jointly move for the scheduling of a status hearing in this matter and to exclude the time from the date of filing of this Motion through the date of such hearing under the Speedy Trial Act (STA). In support of the Motion, the parties state as follows:

On March 26, 2021, the Court orally scheduled a status hearing for April 19, 2021. That status hearing date was later vacated. No status hearing date has been scheduled to date.

Good cause exists for granting this Motion. The Parties have been engaging in discovery and have been in active plea negotiations. Additional time is needed to complete the exchange of discovery and to explore potential pretrial resolution. In order to avoid any disputes regarding the application of the STA,¹ the parties request that the time from the filing of this motion through the date of such status hearing be excluded in the interests of justice from the STA calculation. In light of the respective schedules of undersigned counsel, the parties would request a status hearing the week of August 9-13, 2021, at which time the parties will inform the

¹ With the exception of the time period that would be specifically excluded under the STA per this Joint Motion, Defendant reserves all rights under the STA.

Court of whether they have reached a pretrial resolution and, if not, be prepared to set dates for motions, the pretrial conference and the trial.

Respectfully submitted,

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KIYONAGA & SOLTIS, P.C.

By: /s/Anthony L. Franks
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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July 2021, a true and correct copy of the foregoing Joint Motion for Status Hearing and to Exclude Specified Time Until Hearing Under Speedy Trial Act was electronically filed with consequent service on all attorneys of record.

/s/ Paul Y. Kiyonaga

Paul Y. Kiyonaga