

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 21-cr-00451-CJN
)	
SUZANNE IANNI,)	
Defendant)	

ASSENTED TO MOTION TO CONTINUE

Now comes counsel for Suzanne Ianni and respectfully moves to continue the Plea Agreement Hearing currently scheduled for 7/6/2022. The government agrees to the request.

As reasons therefore,

- 1) On June 20, 2022, the government provided counsel with a proposed written plea agreement;
- 2) Ms. Ianni requests a short extension so that she may continue to consider her options – whether to change her plea, or to proceed to trial;
- 3) Assistant United States Attorney Campbell proposed such a continuance when he delivered the proposed plea agreement, saying, in effect, that he would not oppose moving the hearing to allow Ms. Ianni more time to decide;
- 4) Counsel proposes any of the following dates¹:
July 20, 21, 22, 27, 28, 29
August 16, 17, 19, 22, 23, 24, 25, 26
- 5) The defendant agrees that the time between now and the next date be excluded from the calculations under 18 U.S.C. §§3161(h)(7)(A). The ends of justice served in the delay outweigh the best interest of the public and Mrs. Ianni in a speedy trial.

¹ Counsel will be unavailable for first two weeks of August.

Respectfully submitted,
SUZANNE IANNI,
By her attorney,
Pro Hac Vice

Date: July 1, 2022

/s/ Henry Fasoldt
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, July 1, 2022

/s/ Henry Fasoldt
Henry Fasoldt