

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

EMANUEL JACKSON,
Defendant.

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No. 21-CR-00395 (TJK)

Next date: September 30, 2022

JOINT MOTION TO CONTINUE SEPTEMBER 30, 2022, HEARING

Emanuel Jackson, through undersigned counsel, and the USAO, through Justin Woodward, respectfully move this Court to continue Mr. Jackson’s September 30, 2022, hearing to the week of December 5, 2022.

In support of the motion, counsel states the following:

1. Mr. Jackson’s case is scheduled for a plea hearing on September 30, 2022.
2. Counsel has conferred with AUSA Justin Woodward related to the specific issues involved in Mr. Jackson’s case. Based on the complexities of this matter, the parties need additional time to prepare.
3. Mr. Woodward remained in trial as of September 15, 2022, and undersigned counsel is currently out of the jurisdiction.
4. Based on the information provided to the Court during Mr. Jackson’s status hearings, the parties cannot meet the Court’s September 23, 2022, deadline.
5. The parties are jointly requesting 60 days and respectfully request that the Court set this matter for a plea hearing, the first available date the week of December 5, 2022.
6. Mr. Jackson remains in complete compliance with his pre-trial conditions of release.

WHEREFORE, the parties jointly request that the Court continue the September 30, 2022 plea hearing to the first available date the week of December 5, 2022.

Respectfully submitted,

/s/ Brandi Harden

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2022, I caused a copy of the foregoing motion to be served on counsel of record via ECF.

/s/ Brandi Harden

Brandi Harden, Esq.