

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. :
 : No. 21-CR-00395 (TJK)
 EMANUEL JACKSON, :
 :
 Defendant. :

**UNOPPOSED MOTION TO CONTINUE DECEMBER 9, 2022 HEARING
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through counsel, hereby moves this Court for a continuance of the plea hearing currently scheduled for December 9, 2022, and to further exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* Counsel for defendant Emanuel Jackson does not oppose this motion.

In support of this motion, the Government states as follows:

1. Defendant was charged by criminal complaint on January 18, 2021 [Doc. No. 1], and an information was filed on June 10, 2021 [Doc. No. 28].
2. On September 20, 2022, the Court granted the parties' joint motion to continue the plea hearing until December 9, 2022 and excluded time through December 9, 2022, under the Speedy Trial Act.
3. On December 1, 2022, the government formally extended a plea offer to counsel for Defendant. Accordingly, Defendant and his counsel reasonably need additional time to review the proposed plea materials and prepare for a plea hearing.
4. A brief continuance would allow counsel time to review the proposed plea materials and engage in plea negotiations, which could result in an agreeable pretrial resolution of this case that would preserve judicial resources.

5. Good cause exists to continue this hearing as there is no additional information to provide to the Court regarding the status of this case on the scheduled date of December 9, 2022.

6. Defendant remains in compliance with his pre-trial conditions of release.

7. The parties jointly request that the Court continue the December 9, 2022 plea hearing to a date late in the week of December 26, 2022, or early the week of January 9, 2023.

8. A proposed Order is attached.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the Court grant this Motion to Continue the December 9, 2022 Status Conference, and further requests that the Court exclude the period from December 9, 2022 until the next set plea hearing in this case from the computation of time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B) because the continuance will further talks aimed at a pretrial disposition. The Government also requests that the Court find that the ends of justice served by granting this continuance outweighs the best interests of the public and the Defendant in a speedy trial.

Respectfully submitted,

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Dated: December 2, 2022

CERTIFICATE OF SERVICE

On this 2nd day of December, 2022, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ Justin M. Woodard
Justin M. Woodard
Trial Attorney