

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

**UNITED STATES OF AMERICA** :  
 :  
**v.** : **CASE NO. 21-CR-483 (DLF)**  
 :  
**EDWARD FRANCISCO RODRIGUEZ,** :  
 :  
**Defendant.** :  
\_\_\_\_\_ :

**JOINT MOTION TO CONTINUE STATUS CONFERENCE 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, and defendant Edward Francisco Rodriguez, by and through his attorney, Nora Hirozawa, now file this motion to continue the status conference set for Tuesday, January 17, 2023, in the above-captioned matter, for approximately 7 days, until Tuesday, January 24, 2023; and to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. The parties request the additional time to engage in plea negotiations.

1. On December 1, 2022, Mr. Rodriguez through counsel expressed his desire to plead guilty to Count Two of the Superseding Indictment, which charges violations of 18 USC 111(a)(1) and (b), Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, Inflicting Bodily Injury. The hearing was continued to answer a question from the Court regarding the dismissal of charges by the government at sentencing.
2. On December 16, 2022, during a telephonic status conference, the parties responded to the Court's inquiry, with another status conference scheduled on January 17, 2023. The parties continue their discussion, and request one additional week for consultation.

As such, the parties believe it remains in the interest of justice, over the defendant and the public's right to a speedy trial, to continue serious pretrial discussions.

3. The parties are in agreement that the ends of justice would be served by the exclusion of time under the Speedy Trial Act until the next status conference before this Court. Accordingly, the parties jointly request that time be excluded between today's date through the date of the next status conference.

Respectfully submitted,

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