

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

UNITED STATES OF AMERICA

v.

CHAD BARRETT JONES,

Defendant.

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Crim No. 1:21-cr-00213-RJL

UNITED STATES' CONSENT MOTION TO CONTINUE STATUS CONFERENCE

The United States of America (the "government"), with the consent of counsel for the defendant, Chad Barrett Jones, hereby moves this Court to Continue the Status Conference, currently scheduled for September 8, 2022, at 4:00 p.m., and to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* until the next hearing. In support of this consent motion, the undersigned states as follows:

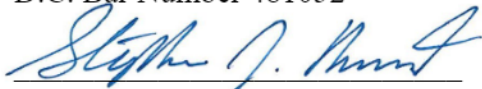
1. On August 16, 2022, the government filed a Consent Motion for Status Conference, and to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* until the next hearing. ECF No. 50. On August 23, 2022, the Court granted the government's Motion and scheduled a Status Conference for September 8, 2022, at 4:00 p.m.
2. Counsel for the government is scheduled to travel on business to Boston, Massachusetts, on September 8, 2022, and return on September 9. Additionally, the government has conferred with counsel for Mr. Jones, and one of Mr. Jones' attorneys, Mr. Gorokov, will be out of town through September 10, 2022. Counsel to the defendant is therefore unopposed to this Motion.
3. Counsel for the government and Mr. Jones are both available at the Court's convenience the week of September 12, 2022. The government is also available the following week except for a hearing on September 23, 2022 at 1:00 p.m.

WHEREFORE, the government respectfully requests that Mr. Jones Status Conference be continued to a later date, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv), and failure to grant such a continuance would result in a miscarriage of justice.

Respectfully submitted,

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By:



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CERTIFICATE OF CONFERENCE

I certify that I have conferred with counsel for Chad Jones, and he is unopposed to this motion.



STEPHEN J. RANCOURT
Assistant United States Attorney