

disclose additional discovery, predominately from other sources, in the future. The United States also begun discussing the resolution of this case by plea. We have provided formal, written plea offers to two Defendants expect to extend formal offers to the remaining three Defendants by the end of this week.

- 3.** The parties have conferred on the case status and agreed that a 60-day continuance of the Status Hearing set for January 28 would assist the parties in their ongoing plea negotiations and in allowing additional time to provide and review ongoing discovery disclosures. It also would allow defense counsel additional time to review the formal, written offers with their clients. The parties also agreed to toll the Speedy Trial Act from the date this Court enters an Order on this motion through and including the date of the next Status Hearing. The parties further request that the Court conduct the next Status Hearing via videoconference.

Accordingly, the parties respectfully request that this Court grant this Motion to Continue the Status Hearing set for January 28 for an additional sixty days 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.* from the date this Court enters an Order on this motion through and including the date of the next hearing on the basis that the ends of justice served by taking such actions outweigh the best interest of the

public and Defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

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