

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

**UNITED STATES OF AMERICA** :  
 :  
 **v.** : **Case No. 21-CR-106 (TJK)**  
 :  
 :  
 **JOSHUA CALVIN HUGHES, et al,** :  
 :  
 **Defendants.** :

**JOINT MOTION TO CONTINUE AND TO  
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The UNITED STATES OF AMERICA, defendant JOSHUA CALVIN HUGHES, and defendant JEROD WADE HUGHES, by and through undersigned counsel, hereby move this Court to continue the status conference currently set for March 10, 2022, for 60 days. The parties further moves move the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the parties state as follows:

1. On January 7, 2022, the Court held a status conference in this case and arraigned the defendants on the Second Superseding Indictment. Both defendants remain on pretrial release and appeared at the hearing via video teleconference. The Court set a status conference for March 8, 2022, and excluded time under the Speedy Trial Act until that date, in the interests of justice.

2. As detailed in its discovery memoranda, the government has provided extensive discovery in this case which requires significant time to diligently review. Counsel continue to review the discovery in preparation for the proceedings. Defense counsel has indicated to government counsel that they require additional time to review the voluminous discovery in preparation for either a resolution of the case or pretrial proceedings

3. The parties are engaged in discussions about a possible resolution of the matter as to both defendants, but, despite due diligence, have not yet reached agreement. The parties believe

that, with additional time to discuss the possibility of resolving the case, it remains possible that a trial would not be necessary. The parties require additional time to discuss legal and factual issues and to negotiate the terms of any possible resolution.

4. At this time, the parties believe that an additional 60 days is necessary to determine whether a resolution is possible or, in the alternative, to continue reviewing discovery in preparation for pretrial proceedings.

5. Given the government's production of voluminous discovery and defense counsel's request for additional time to discuss the plea agreements with the defendants, and considering the reasonable time necessary for effective preparation by all parties taking into account the exercise of due diligence, the failure to grant such a continuance in this proceeding would be likely to make a continuation of the proceeding impossible, or result in a miscarriage of justice. Accordingly, the ends of justice served by granting a request for a continuance outweigh the best interest of the public and the defendants in a speedy trial.

WHEREFORE, for the foregoing reasons, the parties respectfully requests that the Court grant this Motion to Continue the status conference for 60 days, and further request that the Court exclude the period from March 8, 2022, until the next status conference in this case from the computation of time under the Speedy Trial Act.

Dated March 4, 2022.

Respectfully submitted,

For the UNITED STATES:

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