UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

٧.

Jerod Hughes

Joshua Hughes

Defendants

Criminal No. 21-106 (TJK)

Status May 9, 2022

JOINT MOTION TO CONTINUE STATUS

All parties jointly move this court to continue the status in this case currently scheduled for May 9, 2022. In support of this request the parties state the following: There has been a large discovery disclosure including multiple hours of recorded materials that defense counsel have not had an opportunity to review. Due to conflicting trial obligations undersigned counsel anticipates it will be several weeks if not months until the most recent discovery will be fully reviewed. There is a motion to dismiss one of the counts pending that needs to be addressed because it could have a large effect on plea negotiations. All sides are interested in pursuing a negotiated disposition in this case and anticipate there is a good likelihood that an agreement will be reached. Both

defendants are on conditional work release in the community without incident. Both are in compliance with conditions, gainfully employed and supporting their families. Both defendants agree to waive speedy trial rights between now and the next scheduled Court appearance.

Counsel have consulted and have the following dates currently available for rescheduling the status in this case. August 8, 9,10(pm only) 11, 12, 22, 24 (pm only) and 25.

WHEREFORE, all parties request that the Court continue the status to one of the suggested dates or any other convenient date the Court wishes.

Respectfully submitted,

_____/s/___
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Counsel for Jerrod Hughes

CERTIFICATE OF SERVICE

I certify that on May 9, 2022, I caused a copy of the foregoing Motion to be filed with the Clerk using the CM/ECF System which will send notification of this filing to all parties.

Courtesy copies were sent by email to the assigned AUSA and codefendant counsel.

/s/

Jonathan Zucker