

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

UNITED STATES OF AMERICA)	
	(
v.)	Criminal No. 21-88 (DLF)
	(Judge Friedrich
RONALD SANDLIN)	Motions Hearing: June 27, 2022
and	(
NATHANIEL DeGRAVE)	

**JOINT MOTION TO VACATE MOTIONS SCHEDULE
AND TO CONVERT MOTIONS HEARING
TO A STATUS CONFERENCE**

COMES NOW the defendants, Ronald Sandlin and Nathaniel DeGrave, and the United States of America, by and through undersigned counsel, and respectfully move this Honorable Court to vacate the current schedule for pretrial motions and related filings and to convert the currently scheduled pretrial motions hearing to a status conference. In support of this motion, Mr. Sandlin, Mr. DeGrave, and the United States would show:

1. The current pretrial motions schedule is as follows: defense pretrial motions are due on May 9, 2022; responses are due on May 31, 2022; and replies are due on June 6, 2022. A pretrial-motions hearing is scheduled for June 27, 2022. There are currently no other hearings scheduled in this case
2. Undersigned counsel for Ronald Sandlin and Nathaniel DeGrave are still reviewing discovery for this case. Also, the parties are in active plea discussions, and it appears that there is a significant chance that this case may be resolved without a trial.

3. If the government has to reply to defense pretrial motions, it will be investing resources, which in turn will lessen its incentive to resolve this case short of trial. Also, if this case is resolved with a plea, having the parties prepare substantive pretrial motions and related filings that are then mooted results in the unnecessary expenditure of resources. On this point, it should be noted that Mr. Sandlin is represented by court-appointed counsel.

4. The parties believe that, by June 27, 2022 (the current pretrial motions hearing), it will be clear if this case is going to be resolved with a plea or not. If the case is not going to be resolved with a plea, a new motions calendar and motions hearing date can be set at the hearing on June 27, 2022.

WHEREFORE, the defendants, Ronald Sandlin and Nathaniel DeGrave, and the United States of America move this Honorable Court to vacate the current schedule for pretrial motions and related filings and to convert the currently scheduled pretrial motions hearing to a status conference.

Respectfully submitted,

/s/

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