

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21 CR 0084 (PLF)
	:	
	:	
CODY PAGE CARTER CONNELL and	:	
DANIEL PAGE ADAMS	:	
	:	

JOINT MOTION TO CONTINUE STATUS CONFERENCE

1. With the consent of the government, counsel for both Mr. Connell and Mr. Adams seek to continue the status conference scheduled for January 25, 2023 for approximately 14 days.

2. The parties have been engaged in ongoing discussions about a possible resolution of this matter and those discussions have involved back and forth about legal issues and possible terms. On Friday the government communicated with the undersigned about a possible negotiated disposition after communications within the United States Attorney’s Office. The defense needs time to investigate remaining issues regarding the offer and both defendants need time to discuss the offer with counsel before making a final decision. The parties believe that at the next status date the parties will be prepared to either set dates or resolve the matter.

3. The government joins in this application, and both defendants agree that the time between January 25, 2023 and the next date set by the Court is properly excluded under the 18, United States Code section 3161(h)(7)(A). Excluding time will best serve the interests of the public and the defendants in a speedy trial because it will allow the defense to adequately prepare and will allow the parties to engage in discussions regarding a possible disposition.

Dated: January 23, 2023

Respectfully submitted,

/s/

Ned Smock
Assistant Federal Public Defender
Office of the Federal Public Defender
for the District of Columbia
625 Indiana Avenue, N.W.
Washington, D.C. 20004
Tel.: (202) 208-7500