

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 September 8, 2022 for approximately 60 days.

2. The undersigned recently took over representation of Mr. Connell after the departure of his former attorney from the Federal Public Defender Office. In addition, counsel for Mr. Adams is in a motions hearing before Chief Judge Sanchez for the Eastern District of Pennsylvania in *United States v. Mayco Alvarez-Jackson* tomorrow (JS 19-152) and may have difficulty connecting. There has been ongoing disclosure of discovery in this case and both defense counsel need additional time to review discovery and discuss the case with their clients. Further, the government and defense counsel have had initial discussions about resolution of these cases and additional time is necessary to further those discussions.

3. The government joins in this application, and both defendants agree that the time between September 8, 2022 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: September 7, 2022

Respectfully submitted,

/s/

Ned Smock
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