

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-cr-142-CJN</b>
	:	
<b>SAMUEL FISHER</b>	:	
	:	
<b>Defendant.</b>	:	

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

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Samuel Fisher, respectfully and jointly move to continue the status hearing scheduled for April 5, 2022, until a date in May, 2022, as the Court’s schedule permits, and to exclude time under the Speedy Trial Act between April 5, 2022, and the next scheduled date. Defense counsel has authorized the government to file this motion on behalf of both parties. In support of this motion, the parties state the following.

As the parties have previously advised the Court, the defendant has a pending case in New York (NY Sup. Ct. Case No. 01085-2021), in which the defendant is charged with felony firearms offenses. The New York charges arose from the execution of a search warrant obtained during the investigation into the defendant’s conduct that underlies the charges in this case. The defendant recently entered a guilty plea in that case, and he is scheduled to be sentenced on April 4, 2022. The parties expect the defendant will be sentenced to a period of incarceration of 3.5 to 4 years in that New York case.

In light of the resolution of the New York case, the government has extended a plea offer in this case for the defendant’s consideration. To allow sufficient time for defense counsel to

confer with the defendant regarding that offer, the parties move the Court to continue the April 5, 2022, status hearing for approximately 30 days.

Given the ongoing and voluminous discovery in this case, the pending litigation in New York, and the ongoing negotiations regarding a pretrial resolution, the parties submit that the ends of justice served by the requested continuance outweigh the interest of the public and the defendant in a speedy trial, and therefore request that the time between April 5, 2022, and the next hearing date be excluded under the Speedy Trial Act.

A proposed order is attached.

Respectfully submitted,

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