

**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 SCHEDULE CHANGE-OF-  
PLEA HEARING, AND TO 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 May 5, 2022, and schedule a change-of-plea hearing during the week of June 27, 2022 (with the exception of the morning of June 28, 2022), and to exclude time under the Speedy Trial Act between May 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, following his arrest in this matter, the defendant was charged with felony firearms offenses in New York (NY Sup. Ct. Case No. 01085-2021). 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 pled guilty in the New York case, and, on April 4, 2022, was sentenced to a period of incarceration of several years. The defendant is currently in the process of being transferred to the facility where he will serve his sentence.

Since then, the defendant has accepted the government's plea offer in this case, and the parties will submit signed plea paperwork to the Court in anticipation of a change-of-plea hearing.

To allow the defendant to reach the facility where he will serve his sentence in New York, the parties move the Court to continue the May 5, 2022, status hearing and schedule a change-of-plea (or status) hearing during the week of June 27, 2022 (with the exception of the morning of June 28, 2022). The parties anticipate making arrangements for the defendant to appear virtually for that hearing, pending confirmation that the hearing can proceed virtually.

Given the ongoing and voluminous discovery in this case, the developments in the New York case, the negotiations regarding a pretrial resolution, and the need to arrange for a date when the defendant can enter his guilty plea in this case, 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 May 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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