

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff	:	
	:	
v.	:	Criminal No. 21-CR-00258-TFH
	:	
TROY SARGENT,	:	
	:	
Defendant.	:	

MOTION FOR RULE 11 HEARING AND
TO CANCEL STATUS CONFERENCE

Defendant, Troy Sargent, moves this Court, with the assent of the government, to cancel the status conference scheduled for June 1, 2022 and instead schedule the matter for a Rule 11 Hearing at the Court's earliest convenience on or after June 20, 2022, apart from June 24th due to a scheduling conflict on that date. In support thereof, Mr. Sargent anticipates pleading guilty to the Indictment as charged, without a plea agreement. However, the parties do not agree on each specific allegation of the Indictment and are currently working on an agreed statement of offense conduct that addresses the essential elements of each count. The parties do not expect to have that process completed by the status conference currently scheduled for June 1st. In addition, defense counsel has numerous conflicts during the first two weeks of June, and so requests a date on or after June 20th, apart from June 24th.

The Defendant also moves, again with the assent of the government, to

exclude the time until the requested Rule 11 Hearing from the calculations of the Speedy Trial Act for the reasons stated above and in the interests of justice.

Respectfully submitted,
TROY SARGENT
By his attorney,

/s/ Joshua R. Hanye
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Certificate of Service

I hereby certify that this document was sent electronically to those registered through ECF on May 31, 2022.

/s/ Joshua R. Hanye
Joshua R. Hanye