UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Ca
MARIPOSA CASTRO,	:	
Defendant.	:	

Case No.: 1:21-CR-299-RBW

UNOPPOSED MOTION TO CONTINUE THE OCTOBER 1, 2021 SETTING FOR 30 DAYS

The United States of America, through counsel, respectfully requests the Court to grant the Unopposed Motion to Continue the October 1, 2021 Setting for 30 days. The Government further requests the Court exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the Government states as follows:

1. On September 1, 2021, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties, and that the Government would continue to supplement discovery. The parties also discussed a pretrial resolution in this case.

2. The Government has continued to supplement discovery.

3. The parties have discussed the possibility of pretrial resolution of case and are in the process of finalizing the parameters of a plea agreement. The Government also anticipates additional discovery to be produced to defense counsel within the next two weeks.

4. On September 27, 2021, counsel for Defendant and the United States agreed that the October 1, 2021 hearing, should be continued for approximately 30 days. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between September 30, 2021 and the next set Status Conference. The parties also request that the Court conduct the next setting via videoconference.

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5. WHEREFORE, for the foregoing reasons, the Government and respectfully requests that the Court grant this Motion to Continue the October 1, 2021 Setting for 30 Days, and further requests that the Court exclude the period from October 1, 2021 until the next setting in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney DC Bar No. 415793

By: <u>/s/ Frances E. Blake</u> FRANCES E. BLAKE Texas Bar No. 24089236 Assistant United States Attorney Detailee United States Attorney's Office for the District of Columbia <u>Frances.Blake@usdoj.gov</u>

CERTIFICATE OF SERVICE

On September 27, 2021, a copy of the foregoing was served on counsel of record

for the defendant via the Court's Electronic Filing System.

/s/ Frances E. Blake

FRANCES E. BLAKE Assistant United States Attorney