

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

UNITED STATES OF AMERICA

v.

RYAN SETH SULESKI,

Defendant.

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Criminal No. 21-CR-376 (RDM)

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

The United States of America, by and through its attorney the United States Attorney for the District of Columbia, and the defendant, by and through his attorney Maria Jacob, hereby move this Court to vacate the status conference presently scheduled for June 28, 2022, to continue the matter until July 6, 2022, and further to exclude the time within which a trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). The parties have reached a pre-trial disposition in this matter but need additional time to prepare and finalize the paperwork before the currently scheduled June 28, 2022 hearing. The parties have conferred with Chambers and learned that July 6, 2022, at 9:00 a.m., is a convenient date and time for the Court. In addition, the parties are requesting that the hearing proceed as a video teleconference hearing pursuant to the CARES Act.

The parties submit that under these circumstances, the ends of justice to be served by this continuance outweigh the interests of the public and the defendant in a speedy trial, and the Court should consequently exclude time under the Speedy Trial Act for the above stated reasons.

Undersigned counsel has provided a copy of this motion to Maria Jacob, Esq., counsel for the defendant, and Ms. Jacob informed the undersigned that this may be filed as a joint motion. The parties respectfully request a remote change of plea hearing be scheduled for July 6, 2022, at 9:00 a.m.

WHEREFORE, the parties respectfully requests that this Court grant the motion for a short continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Kimberley C. Nielsen
KIMBERLEY C. NIELSEN
Assistant United States Attorney
N.Y. Bar No. 4034138
601 D Street, N.W., Room 3.206
Washington, D.C. 20530
Phone: 202-252-7418
Email: Kimberley.Nielsen@usdoj.gov