

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-453 (JDB)
)	
SEAN MCHUGH,)	
)	
Defendant.)	
_____)	

MOTION TO CONTINUE TRIAL

Defendant, Sean McHugh, through counsel, respectfully requests that the Court grant his request for a continuance of the currently scheduled jury trial. Below are the reasons in support:

- (1) On January 28, 2022, the Court held a status conference where it granted the defense’s oral request for a continuance of the previously scheduled trial and set a new trial date for May 31, 2022, which was later re-set to June 9, 2022 due to a government scheduling conflict.
- (2) Undersigned counsel has been diligently preparing for trial, however, still has outstanding investigative matters that will not be completed before the currently scheduled trial date.
- (3) In addition to outstanding investigation, co-counsel Sabrina Shroff, will leave the Office of the Federal Public Defender at the end of April and undersigned counsel will need to find another co-counsel to assist with the case.
- (4) Lastly, sifting through relativity and evidence.com continues to be a priority and Mr. McHugh wishes for undersigned counsel to thoroughly investigate these two platforms before going to trial.

- (5) Undersigned counsel requests this continuance in good faith with the belief that there will be no more defense requests.
- (6) Undersigned counsel has discussed this request thoroughly with Mr. McHugh, who agrees and consents to this request as well as a further exclusion of time under the Speedy Trial Act.
- (7) Undersigned counsel has also discussed this request with government counsel, who advised that they do not oppose a continuance as long as Mr. McHugh agrees not to re-litigate the issue of detention. Although Mr. McHugh is unsure as to whether or not he will ask the Court for reconsideration on this matter, he does not wish to waive that right all together. However, after speaking with the government, they understand the reasons for the defense request for a continuance and do not oppose a continuance based on those reasons. The parties have conferred regarding re-scheduling the trial and propose a date in October if that is available to the Court.¹

Conclusion

For these reasons, Mr. McHugh respectfully requests that the Court grant this motion for a continuance of the currently scheduled trial.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

¹ The parties discussed earlier dates however due to both parties' trial schedules, October is the earliest month that is available to both the defense and the government.

Maria N. Jacob
D.C. Bar No. 1031486
Assistant Federal Public Defender
625 Indiana Avenue, N.W., Suite 550
Washington, D.C. 20004
(202) 208-7500
Maria_Jacob@fd.org