

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No. 21-cr-455 (RCL)
REED CHRISTENSEN	:	
	:	
Defendant.	:	

UNOPPOSED MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States of America, through undersigned counsel, moves this Court to exclude the time between the February 10, 2023, status conference, and the trial date of May 15, 2023, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* (“STA”).

On February 10, 2023, counsel for the defendant and the government appeared before the Court, via video, for a status conference. At the status conference, the Court set a trial date of May 15, 2023. At the conclusion of the hearing, the government failed to request that the time between the February 10, 2023, status conference, and the trial date of May 15, 2023, be tolled pursuant to the STA. Counsel for the government has consulted with counsel for the defendant. The defendant has no objection to the tolling of time period.

The Speedy Trial Act also provides that any period of delay resulting from a continuance granted by a judge at the request of the defendant or his counsel, or at the request of the attorney for the government, shall be excluded in computing the time within which the trial must begin if the judge grants the continuance on the basis of findings that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Title 18, United States Code, Section 3161(h)(7)(B) sets out a list of factors which the court shall consider in determining whether to grant the continuance based on the ends of justice. One factor, Title 18, United States Code, Section 3161(h)(7)(B)(i), is whether the failure to grant a request for

continuance would result in a miscarriage of justice. Further, under Title 18, United States Code, Section 3161(h)(7)(B)(iv), the Court may allow a continuance in order to permit the defense and the government “reasonable time necessary for effective preparation, taking into account the exercise of due diligence.”

Here, counsel for the defendant and the government agreed to set this matter for trial at the date of earliest convenience of the Court. The trial date of May 15, 2023 has been agreed upon. The government requests that the time between the status conference and the trial date be tolled, with no objection from counsel for the defendant.

CONCLUSION

For the foregoing reasons the government requests that its request for tolling be granted.

Respectfully submitted,

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