

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 21-cr-497 (ABJ)</b>
	:	
<b>ANTHONY ALEXANDER ANTONIO</b>	:	
	:	
<b>Defendant.</b>	:	

**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, Robert Jenkins, hereby move this Court to vacate the status conference presently scheduled for October 4, 2022, to continue the matter for approximately 30 days 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). Since scheduling the October 4, 2022 hearing, an unavoidable conflict arose for the government. In addition, the defense needs additional time to discuss the plea offer as well as to potentially negotiate with the government any resolution to this matter. The parties submit that under these circumstances, the ends of justice to be served by a 30-day 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 Mr. Jenkins, counsel for the defendant, and Mr. Jenkins informed the undersigned that this may be filed as a joint motion. The

parties respectfully request a date on a Friday before November 4, 2022, or any day thereafter that is convenient for the Court.

WHEREFORE, the parties respectfully requests that this Court grant the motion for an approximately 30-day 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  
555 4th Street, N.W., Room 9913  
Washington, D.C. 20530  
Phone: 202-252-7418  
Email: Kimberley.Nielsen@usdoj.gov