

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-mj-226
	:	
YVONNE ST CYR,	:	
	:	
Defendant.	:	

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

The United States of America, by and through its attorney the Acting United States Attorney for the District of Columbia, and defendant Yvonne St. Cyr, by and through her attorneys Miles Pope and Nicole Owens, hereby move this Court to vacate the status conference presently set for December 3, 2021. The parties do not believe a further status is necessary before this Court, but if the Court prefers, the parties do not object to setting a control date in approximately 45 days. The parties note that the time between now and December 15, 2021, is excluded by operation of the Chief Judge’s most recent standing order addressing the COVID-19 pandemic, No. 21-61 (BAH), and that additional tolling is appropriate based on the voluminous discovery in this case, which is still being provided. See prior motions to continue and exclude time, ECF Nos. 11, 16. In support of this motion, the parties state that Ms. St. Cyr has asked that this case be set for trial. To accomplish that, the United States will soon be seeking to file formal charges and to have a District Judge assigned, and the parties can address a trial schedule before that judge.¹

¹ In a previous motion to vacate a status hearing set in November, the parties represented that the government would be filing an information shortly thereafter. After that pleading was filed, the parties conferred regarding additional evidence, and whether that evidence would affect the trajectory of the case going forward. Earlier this week, the defense indicated it still wished to set the case for trial, and as such the government will proceed to seek formal charges and have this case set before a District Court judge, at which time a trial schedule may be set.

Undersigned counsel has consulted with counsel for Ms. St. Cyr regarding this motion.
Counsel for Ms. St. Cyr has represented that the government may file this as a joint motion.

Respectfully submitted,

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

By: /s/ Erik M. Kenerson
Erik M. Kenerson
Assistant United States Attorney
Ohio Bar No. 82960
555 Fourth Street, N.W., Room 11-909
Washington, DC 20530
Erik.Kenerson@usdoj.gov
(202) 252-7201