IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CR NO. 21-MJ-502

ZVONIMIR JURLINA,

Defendant.

<u>CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME</u> <u>UNDER THE SPEEDY TRIAL ACT</u>

The United States, through undersigned counsel, hereby files this motion to adjourn the status conference set for January 12, 2023, in the above-captioned matter, for approximately 60 days, until Tuesday, February 14, 2023. Defense counsel concurs in this motion. The parties request the additional time to engage in plea negotiations.

The parties request that the Court exclude the time until the status conference on February 14, 2023, pursuant to 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).

Respectfully submitted,

MATTHEW M. GRAVES UNITED STATES ATTORNEY D.C. Bar No. 481052

Date: January 5, 2023

By: <u>/s/ Jennifer Leigh Blackwell</u> Jennifer Leigh Blackwell Assistant United States Attorney D.C. Bar No. 481097 United States Attorney's Office 601 D Street, N.W. Washington, D.C. 20530 Telephone: (202) 803-1590 Email: Jennifer.blackwell3@usdoj.gov

CERTIFICATE OF SERVICE

On this 5th day of January, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ Jennifer L. Blackwell

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