

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-CR-25 (RDM)**
 :
JORDEN ROBERT MINK, :
 :
 Defendant. :

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE AND
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 respectfully moves this Court to continue the status conference currently set for October 27, 2022 and to set a status report date for the week of December 12, 2022 and to toll the Speedy Trial Act between October 27, 2022 and the new status report date. This motion is unopposed.

In support of this motion the United States sets forth the following:

1. At the October 13, 2022 Status Conference the parties informed the Court they have reached a tentative agreement and a formal plea offer is being prepared. Accordingly, the Court set a status conference for October 27, 2022 and noted that the date could be used for a plea hearing if the parties are ready to proceed.
2. The status of the case remains the same as on October 13, 2022. Due to unexpected circumstances on the part of the government, a formal plea offer has not yet been extended to the defendant. The parties do, however, anticipate that a plea agreement will be forthcoming and that the matter can be set for a plea date.
3. Accordingly, the government moves this Court to continue the status conference currently set for October 27, 2022 and to set a status report date for the week of December 12, 2022. If

a plea agreement is finalized prior to that date the parties will inform the Court and request a plea hearing date be scheduled.

4. The United States believes it is in the interest of justice to toll the Speedy Trial Act until the December status report date and thus requests a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i) and (iv) and request an exclusion of time under the Speedy Trial Act from October 27, 2022, through the December status report date.
5. The United States has consulted with counsel for the defendant, and they do not oppose this motion.

CONCLUSION

For the foregoing reasons, the government respectfully request that its motion be granted.

A proposed order is attached hereto.

Respectfully submitted,

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