

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

UNITED STATES OF AMERICA

v.

**JODI LYNN WILSON,
and
COLE ANDREW TEMPLE,**

Defendants.

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CASE NO. 21-mj-568 (ZMF)

**CONSENT MOTION TO CONTINUE PRELIMINARY HEARING AND STATUS
CONFERENCE AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through the Acting United States Attorney for the District of Columbia, respectfully moves this Court to continue the preliminary hearing and status conference currently set for Tuesday, October 26, 2021, at 1:00 p.m., in this matter. The government further moves the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. The government and the defendants agree that there is good cause to adjourn the preliminary hearing and status conference in this case for a period of approximately sixty (60) days, from Tuesday, October 26, 2021. The defendants concur in this request and agree that it is in their best interest. In support thereof, the government states as follows:

1. The government and counsels for the defendants have conferred and are continuing to communicate to resolve this matter short of trial.
2. The parties agree that a continuance of approximately sixty (60) days would provide additional time for ongoing discussions, as well as preparation and review of rolling discovery. The parties agree this additional time is necessary for a more fully informed, final disposition in this matter.

The parties, therefore, would respectfully request that the October 26, 2021, preliminary hearing, status conference, and the date by which an information or an indictment must be filed be continued for approximately sixty (60) days. The parties agree that “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from October 26, 2021, to the next Court date shall be excluded in computing the date for speedy trial in this case.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court GRANT this consent motion to continue the preliminary hearing and status conference, and request that the Court exclude the period from October 26, 2021, until the next Court date from the computation of time under the Speedy Trial Act.

Respectfully submitted,

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

By: /s/ Jeffrey McCarther
JEFFREY MCCARTHER
Assistant United States Attorney
Missouri Bar No. 62224
Detailee – Federal Major Crimes
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Consent Motion to Continue Status Conference was served upon counsel of record through ECF on the date of filing.

By: /s/ Jeffrey McCarther
JEFFREY MCCARTHER
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ORDER

This matter having come before the Court pursuant to a Motion to Continue, upon consent, it is therefore

ORDERED that, after taking into account the public interest in the prompt disposition of criminal cases, good cause exists to continue the preliminary hearing and status conference from October 26, 2021 to _____; furthermore, it is

ORDERED that the period from October 26, 2021 to _____, be excluded from computing the time within the Speedy Trial Act because the ends of justice served by such a continuance outweigh the best interests of the public and Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7).

Honorable Zia M. Faruqi
United States Magistrate Judge

Entered: _____