

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-mj-568 (ZMF)
v.	:	
	:	
JODI LYNN WILSON,	:	
and	:	
COLE ANDREW TEMPLE,	:	
	:	
Defendants.	:	

**CONSENT MOTION TO WAIVE PRELIMINARY HEARING AS TO TEMPLE,
CONTINUE JOINT STATUS CONFERENCE, AND EXCLUDE TIME UNDER
THE SPEEDY TRIAL ACT**

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves this Court to continue the preliminary hearing and status conference currently set for Tuesday, December 28, 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 Defendants agree that there is good cause to waive the preliminary hearing as to Defendant Temple, and to continue the status conference in this case for a period of approximately sixty (60) days, from Tuesday, December 28, 2021. 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 Defendants have conferred and are continuing to negotiate to resolve this matter through likely plea agreement.

2. The parties agree that a continuance of approximately sixty (60) days would provide additional time for ongoing negotiations, 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.

3. Counsel for Defendant Temple has determined to waive the preliminary hearing currently set for December 28, 2021, mooted its necessity.

The parties, therefore, would respectfully request that the December 28, 2021, preliminary hearing as to Defendant Temple be vacated, and the joint status conference 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 December 28, 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 VACATE the preliminary hearing as to Defendant Temple, GRANT the continuance regarding the parties’ joint status conference, and request that the Court exclude the period from December 26, 2021, until the next Court date from the computation of time under the Speedy Trial Act.

Respectfully submitted,

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By: /s/ Jeffrey McCarther
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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
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