

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

UNITED STATES OF AMERICA

v.

DEREK COOPER GUNBY,

Defendants.

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CASE NO. 21-CR-626 (PLF)

**JOINT STATUS REPORT AND
MOTION TO 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 defendant Derek Cooper Gunby, by and through his attorney, John Pierce, Esq., now submit this joint status report in response to the Court's request for the parties availability for a bench trial in this matter.

1. The government and the defense have conferred and propose that the Court schedule a bench trial in this case either during the week of July 10-14 or September 25-29, 2023.

2. The parties are in agreement that, because a trial date has been requested in either July or September 2023, and time is needed to continue to review the voluminous discovery and prepare for trial, the ends of justice would be served by exclusion of time under The Speedy Trial Act until the trial date selected by the Court or the date of the next status conference before this Court.

3. The defendant waives his rights under the Speedy Trial Act and agrees to the exclusion of time for the period from today's status report through the date of trial or the next status conference to be scheduled by the Court, whichever is sooner.

Respectfully submitted,

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