UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:
	:
V.	:
	:
RUSSELL TAYLOR,	:
	:
Defendant.	:

Case No. 21-CR-392-2 (RCL)

JOINT MOTION FOR CHANGE OF PLEA HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant Russell Taylor respectfully jointly move for a change of plea hearing. The Parties have reached an in principle agreement for the disposition of the above captioned matter and would like the Court to set a hearing as soon as the Court is able, to avoid further preparations for trial by the Parties.

The Parties understand, based on their joint communications with the Court, that the Court is available to conduct the change of plea hearing on April 19, 2023, at 12:00 p.m. The Parties respectfully request that a change of plea hearing be scheduled for that date and time. Date: March 23, 2023

Respectfully submitted,

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

By:

/s/ ANTHONY W. MARIANO MA Bar No. 688559 THOMAS T. BALLANTINE CA Bar No. 208193 JASON M. MANNING

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