

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

UNITED STATES OF AMERICA,

v.

ANTONY VO

Defendant.

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No. 21-cr-0509 (TSC)

**UNOPPOSED MOTION TO VACATE STATUS CONFERENCE AND SCHEDULE
CHANGE OF PLEA HEARING**

Antony Vo, through undersigned counsel, request that the status conference currently scheduled for March 2, 2022 be vacated and that a change of plea hearing be scheduled. Mr. Vo further requests that time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. In support, Mr. Vo submits as follows:

1. On July 20, 2021, Mr. Vo was charged via criminal complaint with violations of 18 U.S.C. §1752(a)(1), and (2) , and 40 U.S.C. §5104(e)(2)(D), and (G) for allegations arising out of conduct on January 6, 2021. *See* ECF No. 1.
2. On July 26, 2021, Mr. Vo was placed on pre-trial release and ordered to abide by standard conditions. To this date, he has been compliant with all conditions. *See* ECF Nos. 7, 11, 17.
3. On August 5, 2021, the government filed an Information alleging the same charges described above. Mr. Vo entered a plea of not guilty to these charges on August 10, 2021. *See* ECF No. 8.
4. In the interim, the parties have been reviewing discovery and discussing a pre-trial resolution. The parties have agreed on a tentative plea and just need an additional week

to finalize the terms and to ensure that Mr. Vo understands the terms and is prepared to enter a guilty plea.¹

5. Based on the anticipated pre-trial resolution, Mr. Vo requests that the hearing scheduled for March 2, 2022 be vacated and that a plea hearing be set in approximately one week.
6. The parties also request that time be excluded from calculation, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, until the date of the change of plea hearing. The parties submit that this exclusion is warranted and that an order excluding time would best serve the interests and ends of justice and outweigh the interests of the public and defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §3161(h)(7)(A), (B)(i), (ii), and (iv).

WHEREFORE, Mr. Vo asks that this Honorable Court vacate the Status Conference currently scheduled for March 2, 2022, and to schedule a change of plea hearing in approximately one week, and toll time under the Speedy Trial Act until the new hearing date.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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¹ The parties are available on March 8, 9, and 10 in the afternoon if those dates are also available to the Court.