

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

UNITED STATES OF AMERICA)

Case No. 21-CR-519 (TFH)

v.)

STEVEN C. BILLINGSLEY,)
_____)

GOVERNMENT’S CONSENT MOTION TO CONTINUE STATUS HEARING

The United States of America, through undersigned counsel, respectfully moves the Court to continue the status hearing currently scheduled for Tuesday, November 16, 2021, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the undersigned represents:

1. Mr. Billingsley is before the Court charged in a criminal information with two misdemeanor offenses: Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1) and Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2).
2. The defendant remains on release with conditions.
3. Upon defendant’s arrest a cellphone was seized. While it has been sent to the FBI for forensic analysis, the analysis has not been completed and both parties need an opportunity to review it. Further, as set forth in the Government’s Status Report of Discovery, filed November 5, 2021, (Filing No. 20) additional discovery is continuing to be provided to the defense.
4. The parties believe that the requested continuance will allow for further production and review of discovery and potentially facilitate resolution of this case short of trial.

WHEREFORE, the government respectfully requests that this Court grant the motion for a 60-day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq., on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

MATTHEW M. GRAVES
Acting United States Attorney
DC Bar No. 481052

By: /s/ Susan T. Lehr
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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Susan T. Lehr
SUSAN T. LEHR
Assistant United States Attorney

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ORDER

Upon consideration of the Government’s Consent Motion to Continue the Status Hearing scheduled for November 16, 2021, it is this ___ day of _____, 2021 hereby

ORDERED, that the Motion to Continue the Status Hearing is **GRANTED** and the Status Hearing will be continued until _____, 2022 at _____; and it is

FURTHER ORDERED that pursuant to the Motion to Continue, the time from November 16, 2021, to _____, 2022, will be excluded from the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7) as the exclusion would serve the ends of justice and outweigh the interest of the public and of Mr. Billingsley in a speedy trial.

SO ORDERED

DATE

**HONORABLE THOMAS F. HOGAN
UNITED STATES DISTRICT JUDGE**