

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-586
	:	
FRANCIS CONNOR	:	
	:	
and ANTONIO FERRIGNO,	:	
	:	
Defendants.	:	

**MOTION TO VACATE, CONTINUE, AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America hereby moves this Court vacate the April 8, 2022, status hearing scheduled in the above-captioned matter, to set the above-captioned matter for virtual plea hearings, and further to 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). In support of its motion, the government states that the parties are close to reaching an agreement regarding pretrial resolution of this case and need additional time to finalize plea paperwork.

The United States conferred with counsel for each defendant regarding this motion and counsel for defendants Lunyk, Connor, and Ferrigno have each indicated no objection to this motion.

