UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v. : Case No. 1:21-cr-605 (RC)

:

ISAAC WESTBURY, :

AARON JAMES, :

Defendants. :

DEFENDANTS' UNOPPOSED MOTION TO CONTINUE STATUS HEARING

Defendants, through undersigned counsel John M. Pierce, respectfully moves the Court, with no opposition from the United States, to continue this status hearing for a short period of time from June 1, 2023, to a date convenient with the Court and parties. Defendants, with no opposition from the United States, moves the court to toll the Speedy Trial Act, 18 U.S.C. § 3161, et seq., for the time between June 1 and the date convenient with the Court and parties.

Mr. Pierce is not able to appear at the status hearing as he has severe respiratory symptoms including a persistent cough that makes it impossible to speak without severe coughing fits and rib pain. Additionally, Mr. Pierce has what appears to be a severe sinus infection that is potentially dangerous if it progresses further. Defense counsel respectfully suggests that the ends of justice would best

be served if he were given additional time due to the unexpected delay concerning health conditions.

WHEREFORE, Defendants Isaac Westbury and Aaron James respectfully moves the Court to grant said relief and continue the status hearing to a date convenient with the Court and Parties.

Dated: May 31, 2023

Respectfully Submitted,

/s/ John M. Pierce John M. Pierce 21550 Oxnard Street 3rd Floor, PMB #172 Woodland Hills, CA 91367 Tel: (213) 400-0725

Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that, on May 31, 2023, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce

John M. Pierce