

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : **Case No. 21 Cr. 642 (JDB)**  
 :  
 :  
 DARRELL NEELY, :

**JOINT MOTION TO CONTINUE STATUS CONFERENCE**

1. Mr. Darrell Neely appeared before this Court on November 12, 2021, and entered a plea of not guilty. Since then, and as recently as today, January 9, 2022, the government has produced discovery in the case. Discovery production is not yet complete.

2. Mr. Neely has been unable to engage in discovery review as he and his family had a serious personal emergency that required his immediate attention.

3. For these reasons, the parties request the Court to continue the January 11, 2022 status conference by 45-days. The government joins in this application, and Mr. Neely agrees that the time between January 11, 2022 and the next date set by the Court is properly excluded under the 18, United States Code section 3161(h)(7)(A). Excluding time will best serve the interests of the public and the defendant in a speedy trial because it will allow the government to meet its Rule 16 discovery obligations, allow the defendant to review the discovery and allow the parties to engage in discussions regarding a possible disposition.

Dated: January 9, 2022

Respectfully submitted,

*/s/ Sabrina P. Shroff,*  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
For the District of Columbia  
625 Indiana Avenue, N.W.  
Washington, D.C. 20004  
Tel.: (202) 208-7500