

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 1:21-cr-00711-TJK
	:	
v.	:	
	:	
JIA LIU,	:	
	:	
Defendant.	:	

MOTION TO CONTINUE STATUS CONFERENCE

Defendant Jia Liu, by undersigned counsel, hereby respectfully moves the Court to continue the video status conference scheduled for April 12, 2022, 60 days or, in the alternative, two weeks. I make this request for urgent and unforeseen personal reasons. On April 9, my infant son tested positive for COVID-19 after developing symptoms, and this morning I also tested positive. As a result, I am quarantining at home with him and my toddler daughter and will not be available to appear for our scheduled status conference. (We are doing alright, all things considered—our symptoms are somewhat mild so far.)

On April 8, I spoke with counsel for the government about the status of the case. The government anticipates producing more discovery to the defense in the next two weeks. Additionally, the government and the defense have engaged in initial plea discussions. Those discussions have been paused pending developments in Mr. Liu’s parallel case in the Eastern District of New York, *United States v. Liu*, No. 22-cr-70 (DG) (E.D.N.Y.), which was the subject of our last appearance. There is a possibility that both cases can be resolved jointly, although the EDNY case is still young and we only recently received the government’s first discovery production.

Because discovery and plea negotiations remain ongoing, we respectfully request that the Court continue the status conference 60 days and exclude time in the interests of justice under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The government consents to this request. In the alternative, we respectfully request that the Court reschedule tomorrow's status conference in two weeks and exclude time in the interim. By that point, my family's quarantining should be complete and I will be available to appear. The government also consents to this alternative proposal.

I thank the Court for its understanding and attention to this matter.

Respectfully submitted,

/s/

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