

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

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

**MOTION TO CONTINUE STATUS CONFERENCE AND EXCLUDE SPEEDY TRIAL  
TIME**

Defendant Jia Liu, by undersigned counsel, hereby respectfully moves the Court to continue the video status conference scheduled for August 1, 2022, to a date the week of September 12 or thereafter, and exclude Speedy Trial time in the interim. This motion is being filed with the consent of the government.

I make this request because the parties are still involved in plea negotiations regarding this case. Based on recent conversations with government counsel, I anticipate receiving a plea offer in the next week or two. Further, as this Court is aware, Mr. Liu has a parallel case in the Eastern District of New York, *United States v. Liu*, No. 22-cr-70 (DG) (E.D.N.Y.), where he is charged with felony offenses relating to a COVID-19 vaccination card fraud conspiracy. That case is heading toward a resolution in the next several weeks, and successful plea negotiations there will help bring this case to a conclusion, as well.

Because plea negotiations remain ongoing and productive, I respectfully request that the Court continue our status conference to a date on or after September 12, and exclude time in the interests of justice under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). It is my expectation

that by our September status conference, we will be in a position to schedule a change of plea hearing or, should negotiations fail, a trial date.

I have discussed this request with counsel for the government, who consents to the adjournment and exclusion of time. I thank the Court for its understanding and attention to this matter.

Respectfully submitted,

/s/

Benjamin Yaster  
NY Bar No. 4722567  
Federal Defenders of New York, Inc.  
One Pierrepont Plaza, 16<sup>th</sup> Floor  
Brooklyn, NY 11201  
(718) 330-1291  
Benjamin\_Yaster@fd.org  
*Counsel for Jia Liu*