

UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : **CRIMINAL NO. 22-mj-18**
 :
 MATTHEW THOMAS KROL, :
 Defendant. :

**CONSENT MOTION TO CONTINUE PRELIMINARY HEARING AND FOR
EXCLUDABLE DELAY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this Consent Motion to Continue the Preliminary Hearing in the above-captioned matter from March 23, 2022 to March 31, 2022. The Government and the defendant agree that there is good cause to extend the complaint in this case from March 23, 2022 to March 31, 2022, and to adjourn the preliminary hearing/status conference in this case to March 31, 2022. Defendant concurs in this request and agrees that it is in his best interest. In support thereof, the government states as follows:

1.The government and counsel for the defendant have conferred and are continuing to communicate to resolve this matter. Counsel for Defendant was appointed in the Eastern District of Michigan and again when he appeared in DC via Zoom. The government has produced some preliminary discovery. The parties agree that the complaint will remain in full force and effect through the new date of March 31, 2022. The parties agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial detention or pretrial release.

2.The parties, therefore, would respectfully request that the preliminary hearing and the date by which an information or an indictment must be filed be continued until March 31, 2022.

The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from March 23, 2022 to March 31, 2022 shall be excluded in computing the date for speedy trial in this case.

Wherefore, the parties respectfully request that the Court continue the Preliminary Hearing in this matter until March 31, 2022.

Respectfully submitted,

MATTHEW GRAVES
UNITED STATES ATTORNEY

By: /s/ Mitra Jafary-Hariri
MITRA JAFARY-HARIRI
Assistant United States Attorney
Detailee
MI Bar No. P74460
211 W. Fort Street, Suite 2001, Detroit, MI 48226
mitra.jafary-hariri@usdoj.gov
(313) 226-9632

UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. 22-mj-18
 :
 MATTHEW THOMAS KROL, :
 Defendant. :

ORDER

This matter having come before the Court pursuant to a Motion to Continue, upon consent, it is therefore

ORDERED that, after taking into account the public interest in the prompt disposition of criminal cases, good cause exists to extend the Preliminary Hearing from March 23, 2022 to March 31, 2022; it is

FURTHER ORDERED that the period from March 23, 2022 to March 31, 2022 be excluded from computing the time within which an information or indictment must be filed under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the best interests of the public and Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7). The Court finds that COVID-19 has presented complications here that make it difficult for defense to meet with his client and prepare, and that delay is necessary for the parties to work on a potential resolution.

It Is So Ordered.

Zia M. Faruqui
United States Magistrate Judge

Entered: _____