

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 22-cr-198 (JEB)**
 :
RODNEY KENNETH MILSTREED, :
 :
Defendant. :
 :

**JOINT MOTION TO CONTINUE HEARING AND
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, and the defendant Rodney Milstreed, by and through his counsel Rammy Barbari and David Benowitz, hereby files this motion to continue the change of plea hearing set for Friday, February 24, 2023, in the above-captioned matter, for approximately 60 days, until April 14, 2023, or another date convenient to the Court. The parties request the additional time to allow the defense to engage in plea negotiations, review additional recently-collected discovery materials and calculate the likely sentencing guidelines. While the parties had arrived at a resolution to this matter in 2022, since that time, additional information has come to light. At this time, the parties are discussing a modification to the original resolution, which now involves a separate jurisdiction and is taking additional time.

The parties request that the Court exclude the time from February 24, 2023, until the next status date, pursuant to 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Counsel for the defendant has reviewed and joins this motion.

Respectfully submitted,

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