

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-MJ-00027-RMM
	:	
LETICIA VILHENA FERREIRA,	:	
	:	
Defendant.	:	

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

The United States of America, by and through its attorney the United States Attorney for the District of Columbia, and the Defendant, Leticia Vilhena Ferreira, by and through her attorney Lionel Andre', hereby move this Court to vacate the status conference presently scheduled for April 21, 2022, to continue the matter for approximately 30 days, and further to exclude the time within which an indictment must be filed under the Speedy Trial Act, 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), (B)(i), (ii), and (iv).

The United States and the defense are currently working a resolution to this case and need additional time to discuss the discovery and a proposed resolution. The parties agree that the proposed continuance is not for the purpose of delay or without diligence by the parties. Indeed, the parties have been meeting by phone regularly and discussing discovery and other matters. The parties jointly agree that a continuance after the second week of May – to a date between May 16 and 20, 2022 - would serve the ends of justice, including the protection of the defendant's rights, and outweighs the interests of the public and the defendant in a speedy trial. During this proposed time, the parties will continue to identify any remaining discovery and continue discussions about

this case's resolution. Consequently, for the above stated reasons, the parties request that this Court exclude time under the Speedy Trial Act. The Defendant is not in custody.

WHEREFORE, the parties respectfully request that this Court grant the motion for an approximately 30-day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 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), (B)(i), (ii), and (iv).

Respectfully submitted this the 19th day of April, 2022.

MATTHEW M. GRAVES
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CERTIFICATE OF SERVICE

On this 19th day of April, 2022, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

/s/ Michael W. Mitchell

MICHAEL W. MITCHELL

Assistant United States Attorney