

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	CRIMINAL NO.: 1:22-CR-89
NANCY BARRON,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through counsel, hereby moves this Court for a 30-day continuance of the status conference currently scheduled for July 25, 2022, and to further exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* Counsel for defendant Nancy Barron does not oppose this motion.

In support of this motion, the Government states as follows:

1. Defendant was charged by criminal complaint on March 11, 2022 [Doc. No. 1], and an information was filed on March 17, 2022 [Doc. No. 4].

2. On May 27, 2022, the Court held a status conference in this case. The Court scheduled a subsequent status conference for July 25, 2022, in order to allow sufficient time to conduct a plea hearing if the parties were able to reach an agreement by the time of the status conference. The Court excluded the time from May 28, 2022 through July 25, 2022, under the Speedy Trial Act.

3. The undersigned counsel and defense counsel are presently in plea negotiations. A continuance of at least 30 days would allow counsel time to review and consider discovery and to engage in plea negotiations that could result in an agreeable pretrial resolution of this case that would preserve judicial resources.

4. Good cause exists to continue this hearing as there is no additional information to provide to the Court regarding the status of this case on the scheduled date of July 25, 2022. The parties respectfully request that the Court reschedule the status conference for a later date, and exclude from the computation of time under the Speedy Trial Act the time between July 25, 2022, and the next set Status Conference. The parties also request that the Court conduct the next tatus conference via videoconference.

5. A proposed Order is attached.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the Court grant this Motion to Continue the July 25, 2022 Status Conference for approximately thirty days, and further requests that the Court exclude the period from July 25, 2022 until the next status conference in this case from the computation of time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B) because the continuance will further talks aimed at a pretrial disposition. The Government also requests that the Court find that the ends of justice served by granting this continuance outweighs the best interests of the public and the Defendant in a speedy trial.

Respectfully submitted,

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D.C. Bar No. 481052

By: /s/ Justin M. Woodard
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Dated: July 12, 2022

CERTIFICATE OF SERVICE

On this 12th day of July, 2022, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ Justin M. Woodard
Justin M. Woodard
Trial Attorney

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ORDER

Based upon the representations in the Unopposed Motion to Continue and to Exclude Time Under the Speedy Trial Act, and upon consideration of the entire record, it is hereby

ORDERED that the Motion is **GRANTED**; it is further

ORDERED that the currently scheduled status hearing on July 25, 2022, be continued for good cause to _____, 2022, at _____ a.m./p.m.; and it is further

ORDERED that the time between July 25, 2022, and _____, 2022, shall be excluded from calculation under the Speedy Trial Act, *see* 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by granting of such a continuance outweighs the best interests of the public and the Defendant in a speedy trial, as a continuance will provide the parties additional time to review discovery and continue negotiating a potential pretrial resolution.

HONORABLE AMIT P. MEHTA
United States District Judge

Dated: _____, 2022