

**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 May 24, 2022, to continue the matter for approximately 14 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 regularly and discussing discovery and other matters. Most recently, the parties are discussing the final language of the plea agreement and Statement of Offense for the plea agreement, consistent with the evidence in the case.

The parties jointly agree that a continuance to a date after June 7, 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 14-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 23rd day of May, 2022.

MATTHEW M. GRAVES
UNITED STATES ATTORNEY

/s/ Michael W. Mitchell
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CERTIFICATE OF SERVICE

On this 23rd day of May, 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

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**ORDER TO CONTINUE AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

Based upon the representations in the Joint Motion to Continue and to Exclude Time Under the Speedy Trial Act, and upon consideration of the entire record, the Court finds that it would best serve the interests and ends of justice and outweighs the interests of the public and the Defendants in a speedy trial to continue this matter to allow the parties to continue to review discovery and discuss any potential pre-trial resolution.

Therefore, it is this _____ day of May, 2022,

ORDERED that the Joint Motion to Continue and to Exclude Time Under the Speedy Trial Act, is hereby **GRANTED**; it is further

ORDERED that this proceeding is continued to _____, 202__, at _____; and it is further

ORDERED that the time period from the May 24, 2022, status conference through and including the date of the next hearing is hereby excluded from the computation of time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

HONORABLE ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE