

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-00368 (JDB)**
 :
 JODY LYNN TAGARIS :
 :
 Defendant. :

JOINT MOTION FOR CONTINUANCE OF SENTENCING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, with the consent of defense counsel, Jeff T. Gorman, respectfully prays as follows:

1. A sentencing hearing is currently set February 16, 2022, at 11:00 a.m. before the Court.
2. The parties need additional time to complete a condition of the plea agreement pertaining to the Defendant’s cooperation with additional investigation—namely, the Defendant still needs to provide certain information to law enforcement.
3. Accordingly, the United States, with the consent of the defense, requests that the sentencing hearing be continued for a period of approximately 45-days, that is until April 4, 2022, or thereafter, at a date that is convenient for the Court.
4. The parties further request that the Court exclude the days between the date of this filing and the sentencing hearing from calculation under the Speedy Trial Act, *see* 18 U.S.C. § 3161(h)(7)(A), because the 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 with the opportunity to fulfill the obligations contained in the plea agreement and file their sentencing memoranda.

WHEREFORE, the Government respectfully requests that the Court continue the sentencing hearing until April 4, 2022, or thereafter, at a date that is convenient for the Court and toll the Speedy Trial Act until that time.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar Number 481052

/s/ David T. Henek
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ David T. Henek
DAVID T. HENEK
Assistant U.S. Attorney