

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

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

CONSENT MOTION TO VACATE AND CONTINUE SENTENCING

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

1. A sentencing hearing is currently set for April 11, 2022, at 2:00 p.m. before the Court, with sentencing memoranda due March 28, 2022.
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. Although the Government believed it could obtain certain information from the Defendant without the need of conducting a formal interview, the Defendant’s recent response was insufficient to satisfy the Government. Accordingly, the Government will need to schedule and conduct a formal interview of the Defendant, which is consistent with the terms of the plea agreement.
3. Accordingly, the parties request that the Court vacate the current sentencing memoranda deadline as well as the sentencing hearing set for April 11, 2022. The parties would propose that the Court set new deadlines once Defendant has satisfied her obligations pursuant to the plea agreement.
4. The United States will seek to schedule the Defendant’s interview as soon as possible and

will report back to the Court once the interview is complete so that the Court can set a deadline for sentencing memoranda and set a sentencing date.

5. 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, with the consent of defense counsel, respectfully requests that the Court VACATE the sentencing hearing and toll the Speedy Trial Act until sentencing occurs.

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