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2 Northern District of California  
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7 Counsel for Defendant SHAW

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE DISTRICT OF COLUMBIA

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 DANIEL SHAW,  
16 Defendant.

**Case No.:** CR 22-00001 EGS

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE STATUS  
CONFERENCE AND EXCLUDE TIME**

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18 The above captioned matter is currently set for a status conference on March 22, 2022. Defense  
19 counsel has received additional discovery and requires additional time to review the discovery and  
20 meet with Mr. Shaw. Therefore, the parties agree that the matter be continued to a day favorable to the  
21 Court from April 4 – April 7, 2022 or April 11 – 12, 2022.

22 The parties further stipulate and request that, under the Speedy Trial Act, the Court exclude  
23 and toll the time from March 22, 2022 to the next status conference. An exclusion is appropriate  
24 under 18 U.S.C. § 3161(h)(7)(B)(iv), effective preparation of counsel, taking into account the  
25 exercise of due diligence. An exclusion of time from March 22, 2022 to the next status conference, is  
26 also appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), as the ends of justice served the granting of  
27 such continuance outweigh the best interest of the public and the defendant in a speedy trial.  
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Dated: February 16, 2022

Respectfully submitted,

GEOFFREY A. HANSEN  
Acting Federal Public Defender  
Northern District of California

/S

ELISSE LAROUCHE  
Assistant Federal Public Defender

February 16, 2022

MATTHEW M. GRAVES  
United States Attorney  
District of Columbia

/S

MARIA FEDOR  
Attorney, detailed to the U.S.  
Attorney's Office for the District of  
Columbia

**[PROPOSED] ORDER**

On the motion of counsel, it is HEREBY ORDERED that the status conference presently set for March 22, 2022 is continued to \_\_\_\_\_ at \_\_\_\_\_.

IT IS FURTHER ORDERED that the period from March 22, 2022 through \_\_\_\_\_, shall be excluded from calculation under the Speedy Trial Act, 18 U.S.C. §3161 et. seq. because for the reasons stated in defendant's motion, the Court finds that it is unreasonable to expect adequate preparation for pretrial proceedings and trial within the time limits of the Act and that the extension is reasonably necessary for the defendant and counsel to prepare effectively, and the ends of justice served by the continuance outweigh the interest of the public and Defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(B)(iv).

Dated: \_\_\_\_\_

EMMETT G. SULLIVAN  
United States District Judge