

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 1:21-CR-737 (EGS)</b>
v.	:	
	:	
<b>JEFFREY WILLIAM HUBBARD,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION TO CONTINUE STATUS HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Jeffrey William Hubbard, by and through his attorney, Assistant Federal Public Defender Conor Huseby, respectfully move the Court to continue the status hearing currently scheduled for Tuesday, June 28, 2022, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the parties represent:

1. The government recently produced to defense counsel the contents of the Cellebrite extraction report for the defendant's cellular phone, which contains over 13 gigabytes of data. Defense counsel has represented to the government that he requires additional time to continue reviewing case-specific and global discovery with the defendant.
2. The parties have discussed a potential pretrial disposition of this case and believe that such disposition will occur within the next 60 days.
3. The defendant remains on release with conditions and the parties are not aware of any issues.
4. The parties believe that the requested continuance will allow for further production and review of discovery and facilitate discussions of a potential resolution short of trial.

WHEREFORE, the parties respectfully request that this Court grant the motion for a 60-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,  
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