

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

THE UNITED STATES OF AMERICA §  
§  
VS. § NO. 22-cr-00153 (RCL)  
§  
RAUL JARRIN §

**UNOPPOSED MOTION TO CONTINUE AND EXCLUDE TIME**  
**UNDER THE SPEEDY TRIAL ACT**

Defendant, Raul Jarrin, and The United States of America hereby move this Court for an additional 60-day continuance of the November 3, 2022, status hearing scheduled in the above-captioned matter, and further to 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). In support of its motion, the government states as follows:

Counsel for defendant is working with counsel for the government to address issues in a draft factual basis in support of a guilty plea. Both counsel are reviewing discovery to ensure the facts are accurate before proceeding with a change of plea hearing. Counsel for the government plans to meet with the appropriate federal agents to address defense counsel's concerns about statements within the factual basis.

WHEREFORE, the defendant respectfully requests that this Court grant a 60-day continuance of the November 3, 2022, status hearing scheduled in the above-captioned matter, 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), for the reasons detailed above.

Respectfully submitted,

/s/ Kent A. Schaffer

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Counsel for Defendant,

RAUL JARRIN

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2022, 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 registered parties.

/s/ Kent A. Schaffer

KENT A. SCHAFFER