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Counsel for Defendant HOLDRIDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRENT JOHN HOLDRIDGE,

Defendant.

**Case No.:** CR 21-729 RBW

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

The above captioned matter is currently set for a status conference on April 5, 2022. Defense counsel have received additional discovery and require additional time to review the discovery, meet with Mr. Holdridge, and continue to negotiate a potential pretrial resolution. Therefore, counsel for the defendant request that the matter be continued to May 9, 2022 at 12:00 p.m.

Defense counsel further request that, under the Speedy Trial Act, the Court exclude and toll the time from April 5, 2022 to May 9, 2022 so that defense counsel can continue to prepare, including reviewing discovery and continue negotiating a potential pretrial resolution. An exclusion of time between April 5, 2022 until the next status conference is appropriate under 18 U.S.C.

§ 3161(h)(7)(B)(iv) for effective preparation of counsel, taking into account the exercise of due diligence. An exclusion of time is also appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), as the ends of justice served the granting of such continuance outweigh the best interest of the public and the

1 JODI LINKER Federal Public Defender 2 Northern District of California GABRIELA BISCHOF 3 WHAYEUN  
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defendant in a speedy trial.  
8 9 IN THE UNITED STATES DISTRICT COURT 10 FOR THE DISTRICT OF  
COLUMBIA 11 12 UNITED STATES OF AMERICA, Case No.: CR 21-729 RBW 13 Plaintiff, UNOPPOSED  
MOTION TO CONTINUE AND TO EXCLUDE TIME UNDER THE 14 v. SPEEDY TRIAL ACT 15 BRENT JOHN  
HOLDRIDGE, 16 Defendant. 17 18 The above captioned matter is currently set for a status conference on April  
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and the STIPULATION TO CONTINUE STATUS HOLDRIDGE, 21-729 RBW 19 defendant in a speedy trial. 2  
The government does not oppose this motion. 3 4 5 6 Dated: March 24, 2022 Respectfully submitted, 7 JODI  
LINKER Federal Public Defender 8 Northern District of California 9 /S WHAYEUN (CHLOE) KIM 10 Assistant  
Federal Public Defender 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 STIPULATION TO CONTINUE  
STATUS HOLDRIDGE, 21-729 RBW 2

/S

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Assistant Federal Public Defender