

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 FOR CONTINUANCE OF CHANGE OF PLEA HEARING

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

1. A plea agreement hearing is currently set for October 15, 2021 at 10:30 a.m. before the Court.
2. Although the parties will enter into a plea agreement in this case, they are still in the process of negotiating the specific terms of the agreement and drafting the agreement. The parties need additional time to finalize the agreement and prepare for a change of plea hearing.
3. Accordingly, the United States, with the consent of the defense, requests that the change of plea hearing be continued for a period of approximately 45-days, that is until December 1, 2021 or thereafter, at a date that is convenient for the Court.

WHEREFORE, the Government respectfully requests that the Court continue the change of plea hearing until December 1, 2021, or thereafter, at a date that is convenient for the Court.

Respectfully submitted,

CHANNING D. PHILLIPS
United States Attorney
D.C. Bar Number 415-793

/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