

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-00543 (CRC)
	:	
ABIGAIL YAZDANI-ISFEHANI,	:	
	:	
Defendant.	:	

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

The United States of America and defendant, Abigail Yazdani-Isfehiani, hereby move this Court for an additional 30-day continuance of the July 28, 2022, change of plea 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:

- The government has provided counsel for defendant with a plea offer. Additional time is needed for counsel for the defendant to review the plea offer.

WHEREFORE, the government respectfully requests that this Court grant a 30-day continuance of the July 28, 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,

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