

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

UNITED STATES OF AMERICA,)	
)	
v.)	
)	No. 22-CR-373 (RCL)
DAVID RENE ARREDONDO,)	
)	
Defendant.)	
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**JOINT MOTION TO CONTINUE STATUS CONFERENCE AND TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

The United States, jointly with counsel for the defendant, hereby files this motion to adjourn the status conference, currently set for February 7, 2023, in the above-captioned matter, for approximately 60 days, until Tuesday, April 7, 2023. The parties request the additional time to engage in plea negotiations and review additional discovery productions which are ongoing.

To update the Court on the status of the case, the United States has provided preliminary discovery for this case and has included global discovery productions. Although the overwhelming majority of discovery has been provided, there are some outstanding items that still need to be produced, and counsel for the United States has provided information to defense counsel about these outstanding items. The United States anticipates providing a plea offer once defense counsel has received the full discovery. The parties thereby request this continuance of 60 days to evaluate the ongoing discovery productions and to engage in meaningful plea negotiations.

The parties request that the Court exclude the time until the next status conference on April 7, 2023, pursuant to 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).

Respectfully submitted,

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