

**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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**CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND TO EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT**

The United States, hereby files this motion to adjourn the status conference, currently set for April 6, 2023, in the above-captioned matter, for approximately 60 days, until Tuesday, June 13, 2023. The parties request the additional time to engage in plea negotiations and review additional discovery productions which are ongoing. The Defendant, through counsel, consents to this motion.

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 parties are still reviewing the ongoing discovery productions. The parties thereby request this continuance of 60 days to evaluate the ongoing discovery productions and to engage in meaningful plea negotiations.

The United States request that the Court exclude the time until the next status conference on June 13, 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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/s/ Christopher M. Cook
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