

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

UNITED STATES OF AMERICA

V.

DAVID RENE ARREDONDO

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NO. 22-CR-373-RCL

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

Defendant DAVID RENE ARREDONDO (“Mr. Arredondo”), by and through undersigned counsel, hereby files this motion to continue the status conference, currently set for August 4, 2023, in the above-captioned matter, for approximately 60 days, until Tuesday, October 3, 2023. Counsel for the Defendant has been informed that another prosecutor has taken over this case. The parties request the additional time to engage in plea negotiations and review additional discovery productions which are ongoing. The government consents to this motion.

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

Mr. Arredondo request that the Court exclude the time until the next status conference on October 3, 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,

Maureen Scott Franco
Federal Public Defender

/S/

JOHN P. CALHOUN
Assistant Federal Public Defender
Western District of Texas
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of July, 2023, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of such filing to the following: AUSA, Raymond Woo, Office of the U.S. Attorney, 40 N. Central Ave., Ste 1800, Phoenix, Arizona 85004.

/S/

JOHN P. CALHOUN
Attorney for Defendant