

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-cr-00016-CJN
	:	
BRYAN BUSTOS, et al.	:	
	:	
Defendants.	:	

**MOTION TO SCHEDULE A STATUS CONFERENCE
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through counsel, hereby requests that this Court set a status hearing in 60 days and to further exclude the time within which the trial must commence under the Speed Trial Act, 18 U.S.C. § 3161 *et seq.*

In support of this motion, the Government states as follows:

1. On January 24, 2022, the Court held the first Status Conference in this case. The Court ordered a Status Report due by March 24, 2022. The parties agreed to exclude from the computation of time under the Speedy Trial Act the time between January 24, 2022, until March 24, 2022.
2. On March 23, 2022, the Government filed a consent motion for excludable delay, to afford the parties sufficient time to review the voluminous evidence, including electronic evidence and consistently updated global discovery, in this case.
3. On March 28, 2022, the Court granted the Government’s motion and found that “the ends of justice served outweigh the best interests of the defendants and the public in a speedy trial.”

4. The United States continues to provide individualized discovery to both Defendants, as well as updated global discovery generated from other sources, including evidence from other charged defendants' devices, social media accounts, and other sources which has not yet been identified or examined.

5. The undersigned counsel and defense counsel are presently in plea negotiations. A status hearing set in 60 days would allow counsel time to review and consider discovery and to engage in plea negotiations that could result in an agreeable pretrial resolution of this case that would preserve judicial resources.

6. The Government additionally requests that the Court conduct the next Status Conference via videoconference.

7. A proposed Order is attached.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the Court grant this Motion to set a status hearing in 60 days, and further request that the Court exclude the period from June 1, 2022, until the next Status Conference in this case from the computation of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B) because the continuance will further talks aimed at a pretrial disposition. The Government also requests that the Court find that the ends of justice served by granting this continuance outweighs the best interests of the public and the Defendants in a speedy trial.

Respectfully submitted,

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Dated: May 27, 2022

CERTIFICATE OF SERVICE

On this 27th day of May 2022, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ Thomas Campbell
Thomas D. Campbell
Trial Attorney