

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Criminal No. 21-mj-672</b>
	:	
<b>RONALD LOEHRKE and</b>	:	
	:	
<b>JAMES HAFFNER,</b>	:	
	:	
<b>Defendants.</b>	:	

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

The United States of America hereby moves this Court for a 120-day continuance of the above-captioned proceeding, and further to exclude the time within which an indictment must be filed 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 particular, the government has produced a large volume of discovery to the defense in this case, and those productions remain ongoing. For a general description, *see* ECF No. 20. Counsel requires time to sort through this discovery, discuss it with their clients, and decide how they want to proceed with the case. Government counsel and counsel for one defendant are additionally currently in trial in other matters. The government submits, without objection from the defendants, that the ends of justice in allowing this review to continue outweigh the interests of the defendant and the public in a speedy trial.

Undersigned counsel has provided a copy of this motion to Bruce Harvey and Brad Barshis, counsel for the defendants, and each defense counsel represented to undersigned counsel that the government may file this motion unopposed.

WHEREFORE, the government respectfully requests that this Court grant the motion for a 120-day continuance of the above-captioned proceeding, and that the Court exclude the time within which an indictment must be filed 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).

Respectfully submitted,

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