

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

UNITED STATES OF AMERICA

v.

JOHN O’KELLY,

Defendant.

Case No. 1:22-mj-221

**JOINT MOTION TO CONTINUE STATUS HEARING AND
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, through undersigned counsel, and the defendant John O’Kelly, by and through his counsel Evan Sugar, hereby files this motion to adjourn the status hearing set for Tuesday, January 10, 2023, in the above-captioned matter, for approximately 60 days, until March 7, 2023, or another date convenient to the Court. The parties request the additional time to allow the defense to review voluminous discovery, engage in plea negotiations, and calculate the likely sentencing guidelines. The defendant waived his right to a preliminary hearing at his initial appearance on October 27, 2022.

The parties request that the Court exclude the time from January 10, 2023, until the next status date, 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 indictment and trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Counsel for defendant John O’Kelly has reviewed and joins this motion.

Respectfully submitted,

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