

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 V.) Case No.: 1:23-cr-029-AMP
)
 BOBBY WAYNE RUSSELL)

JOINT MOTION TO CONTINUE AND EXCLUDE TIME
UNDER SPEEDY TRIAL ACT

Defendant Bobby Wayne Russell, through undersigned counsel, hereby files this motion to continue the change of plea hearing currently set for May 26, 2023 in the above-captioned matter, for approximately 30 days until June 26, 2023 (or a subsequent date suitable to the Court and counsel). Government counsel concurs in this motion. The parties request the additional time to engage in plea negotiations and review ongoing discovery productions.

The parties further request that the Court exclude the time until change of plea hearing, 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,

KEVIN L. BUTLER
Federal Public Defender

/s/Jake Watson
Jake Watson
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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2023 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties of record.

Respectfully submitted,

/s/Jake Watson

Jake Watson

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ORDER

Based upon the representations in the Joint Motion to Continue and to Exclude Time Under the Speedy Trial Act, and upon consideration of the entire record, it is hereby

ORDERED that the Motion is GRANTED; it is further

ORDERED that the currently scheduled change of plea hearing on May 26, 2023, be continued for good cause to June _____, 2023, at __p.m., and it is further

ORDERED that the time between May 26, 2023 and June _____, 2023 shall be excluded from calculation under the Speedy Trial Act, see 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by the granting of such a continuance outweighs the best interests of the public and the defendant in a speedy trial, as a continuance will provide the parties additional time to review discovery, engage in plea negotiations, and complete logistical steps related to an anticipated plea-trial resolution.

**THE HONORABLE AMIT P. MEHTA
UNITED STATES DISTRICT JUDGE**