

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

UNITED STATES OF AMERICA

v.

REBECCA LAVRENZ,

Defendant.

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Case No. 1:22-mj-208 (GMH)

JOINT MOTION TO CONTINUE STATUS CONFERENCE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, by and through her attorney, respectfully request that the status conference in this case be cancelled, or at least continued. In support, the parties state as follows:

1. The defendant is charged by complaint with four misdemeanor crimes, violations of 18 U.S.C. § 1752(a)(1), 18 U.S.C. § 1752(a)(2), 40 U.S.C. § 5104(e)(2)(D), and 40 U.S.C. § 5104(e)(2)(G).
2. A status conference is scheduled for today, February 28, 2023.
3. At this time, a status conference is unnecessary and would likely be an inefficient use of the Court's resources. The parties held a reverse proffer on February 27, 2023. Despite that, the defendant has decided that she wishes to go to trial. Accordingly, the next steps are for the government to charge the defendant by information, for her to have her initial appearance in D.C., for the government to provide discovery, and for the parties and the Court to set a trial date. But there is nothing to do today.
4. As noted above, the defendant consents to this motion.

5. The parties have discussed a new status conference date and suggest that if the Court wishes to re-set the status conference at all, it do so for a date after April 15, 2023, that is mutually convenient for the parties and the Court.
6. The defendant consents to the exclusion, under the Speedy Trial Act, of the time between today and the next court date.
7. In addition, because the defendant is on release, any continuance will not impact his liberty.

WHEREFORE, in light of the foregoing, defendant asks this Court to VACATE the currently-scheduled hearing set for February 28, 2023, and either not re-set it, or re-set the status conference hearing for a date after April 15, 2023, that is available to the parties and this Court, and for any other relief this Court deems just and proper.

Respectfully submitted,

MATTHEW M. GRAVES
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ORDER

Upon consideration of the parties' joint motion seeking to vacate and continue the status conference scheduled for February 28, 2023, it is hereby

ORDERED, that the motion is GRANTED.

If the status conference is to be re-set, it will be rescheduled by separate notice.

Date:

THE HONORABLE G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE