

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 23-cr-069-CKK</b>
	:	
<b>ISAAC THOMAS,</b>	:	
<b>CHRISTINA LEGROS,</b>	:	
	:	
<b>Defendants.</b>	:	

**UNITED STATES’S MOTION TO EXCLUDE TIME UNDER  
THE SPEEDY TRIAL ACT, 18 U.S.C. § 3161**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, moves this Court to exclude the time with which the trial must commence under 18 U.S.C. § 3161(c)(1), pursuant to section (h)(4) and (6), because Defendant Christina Legros is physically unable to stand trial.

Counsel for Defendant Legros provided this Court with information in ECF 14 that Ms. Legros was currently hospitalized, and counsel is unable to make contact with her given her condition. Any time that she is hospitalized should be excluded under § 3161(h)(4) given that she is physically unable to stand trial.

Further, in § 3161(c)(1) the applicable period begins, “[i]n any case in which *a plea of not guilty is entered . . .*” (emphasis added). Trial must then commence, “within seventy days from the filing date (and making public) of the information or indictment, or from the date the defendant has appeared before a judicial officer of the court in which such charge is pending, *whichever date last occurs.*” (emphasis added).

Here, the indictment was filed on March 11, 2023, “within thirty days from the date on which [Ms. Legros] was arrested . . .” *See* § 3161(b). But until she is able to appear to enter a plea of not guilty, the 70-day period will not begin to run. However, she is not the only defendant joined under the same caption.

The Court should also exclude the period of delay for Defendant Isaac Thomas following his arraignment on the indictment under § 3161(h)(6) because he is joined together with codefendant Christina Legros, whose time for trial will not have yet run given her hospitalization. Given the recency of both cases in this Court, the exclusion as to both is reasonable under the factual circumstances.

Respectfully Submitted,

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*/s/ Adam M. Dreher*

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