

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
WASHINGTON D.C.

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CASE NO. 1:23-mj-00337
	§	
DANA JEAN BELL	§	(Judge Meriweather)

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Dana Jean Bell, by and through her attorney, Joe Shearin, and requests a continuance of the status hearing in this matter:

I.

Defendant Bell has been charged by a criminal complaint in the above referenced case number for multiple offenses alleged to have occurred on or about January 6, 2021. Ms. Bell initially appeared with counsel, Joe Shearin, by video teleconference on December 14, 2023, before the Honorable Magistrate Judge G. Michael Harvey. Ms. Bell remains on bond.

II.

This case is currently set for a status hearing on February 27, 2024, before the Honorable Magistrate Judge Robin M. Meriweather.

III.

Defense counsel continues to review the video discovery in this case and requests a continuance of the status hearing to allow the Defendant and her attorney to appropriately address certain questions of fact and law. Furthermore, counsel for the

Defendant and Assistant United States Attorney, Samantha R. Miller, are exploring and discussing a pre-indictment resolution to this matter. A short, approximately 45 day continuance is sought, preferably during the week of April 8, 2024.

IV.

Defendant Bell agrees to exclude time under the Speedy Trial Act from February 27, 2024 until the status hearing reset date as determined by the Court.

V.

This Motion for Continuance is not sought for the purpose of unnecessary delay but, rather, that justice is done. Assistant United States Attorney, Samantha R. Miller, has no objection to the granting of this Motion.

Respectfully submitted,

/s/ William L. Shipley
William L. Shipley, Jr., Esq.
PO BOX 745
Kailua, Hawaii 96734
Tel: (808) 228-1341
Email: 808Shipleylaw@gmail.com
Attorney for Defendant

/s/ Joe Shearin

JOE SHEARIN
State Bar No. 18172300
8150 N. Central Expressway
Suite M1101
Dallas, Texas 75206
214-228-2801
Fax: 214-468-8104
joeshearinlaw@gmail.com

Attorney for Defendant Bell