

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
AND AMENDMENTS OF BOND CONDITIONS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Dana Jean Bell, by and through her attorney, Joe Shearin, and:

- A. Requests a continuance of the status hearing in this matter, and
- B. Requests amendments of bond conditions.

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 April 9, 2024, before the Honorable Magistrate Judge Robin M. Meriweather.

A. Request for continuance:

III.

Defense counsel continues to review the voluminous discovery in this case and continues to address certain questions of fact and law with the Defendant.

Correspondingly, counsel for the Defendant and Assistant United States Attorney, Samantha R. Miller, continue exploring and discussing a pre-indictment resolution to this matter. If the Court is available, a short, specific continuance is requested until Friday, May 3, 2024, to combine the status hearing with an arraignment if the parties do not reach a plea agreement.

IV.

Defendant Bell agrees to exclude time under the Speedy Trial Act from April 9, 2024 until the status hearing reset date.

V.

This Motion for Continuance is not sought for the purpose of unnecessary delay but, rather, that justice is done.

B. Request for bond condition amendments:

VI.

Furthermore, Defendant Bell asks the Court to amend the Order Setting Conditions of Release signed by Magistrate Judge G. Michael Harvey on December 14, 2023. Defendant requests that “Additional Conditions of Release” (7)(f) be amended to allow Defendant to travel in the Northern District of Texas to visit and care for her 92-year-old mother who is in poor health and to meet with defense counsel without advanced notification to Pretrial Services Agency (PSA) in the Eastern District of Texas.

Additionally, Defendant requests (7)(g) be amended to allow contact with her daughter, Kailey Nemeth, with the understanding and agreement that the two will not discuss the events of January 6, 2021, nor any subsequent investigation or prosecution.

VII.

Assistant United States Attorney, Samantha R. Miller, has no objection to the granting of this Motion.

Respectfully submitted,

/s/ Joe Shearin
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Attorney for Defendant Bell

CERTIFICATE OF CONFERENCE

I have conferred with Samantha R. Miller, Assistant United States Attorney for the District of Columbia, and she has no objection and is UNOPPOSED to the granting of this Motion.

/s/ Joe Shearin
JOE SHEARIN

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 2nd day of April, 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

/s/ Joe Shearin
JOE SHEARIN