

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 23-mj-00337-GMH
	:	
DANA JEAN BELL,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE AND CONVERT
STATUS CONFERENCE TO CHANGE OF PLEA HEARING**

On April 26, 2024, the defendant, Dana Jean Bell, notified the government of her intent to plead guilty to a pre-indictment information in this matter. Therefore, the parties respectfully move the Court to briefly continue the currently-scheduled May 2, 2024 status conference and to convert the status conference to a change of plea hearing in late May, which will provide the parties with a limited amount of additional time to finalize the plea paperwork.

In addition, the parties also respectfully request the Court exclude time under the Speedy Trial Act through and including the revised change of plea hearing date in late May. Exclusion here is appropriate under Section 3161(h)(7)(A) and (B)(i) to best conserve resources and to allow the parties time to review and finalize the plea paperwork.

Respectfully submitted,

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