

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

UNITED STATES OF AMERICA	:	
	:	Case No. 23-CR-00414 (DLF)
v.	:	
	:	
ESVETLANA CRAMER,	:	
	:	
Defendant	:	

**JOINT MOTION TO SET ARRAIGNMENT AND CHANGE OF PLEA HEARING AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America for the District of Columbia, and Defendant, Esvetlana Cramer, respectfully submit this joint motion to set a Hearing for an Arraignment and Change of Plea and to exclude time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, in the interest of justice.

Defendant was charged by complaint (23-mj-182-RMM) for violations related to their actions on January 6, 2021. Defendant self-surrendered in Pennsylvania on July 26, 2023, for misdemeanor charges related to entering and remaining in a restricted building or grounds. Defendant is not in custody. Status conferences were held remotely on October 5, 2023 and on December 7, 2023. Time under the Speedy Trial Act was excluded in the interest of justice.

The Government has provided discovery and a written plea offer. The parties have come to an agreement. The Government filed an Information in the above case on November 27, 2023. All plea documents have been executed. The parties now move this Honorable Court to set a Hearing for Arraignment on the Information and a Change of Plea.

At the request of the Government, Defendant filed a Notice of Filing on December 13, 2023. See DE 25. waiving Speedy Trial until the Arraignment and the Change of Plea Hearing. The Government has received a communication from the Court in codefendant Barber's case (23-CR-409 (DLF)) directing the Defendant to file a motion stating reasons for the exclusion of time.

The parties now file a joint motion to address the Court's directive, and to request the case be set for a Change of Plea and Arraignment, with time excluded in the interest of justice. As noted in the Defendant's attachment to her Notice of Filing, Ms. Cramer waives time under the Speedy Trial Act until her Arraignment and Change of Plea. Conflicts in the Court Calendar, and the unavailability of the parties during the holidays prevented this matter from going forward in December.

The parties now request this Honorable Court set a Hearing for an Arraignment and Change of Plea in January and to exclude time from December 7, 2023 until that date, in the interest of justice.

Respectfully submitted,

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