

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Criminal No. 21-mj-226</b>
	:	
<b>YVONNE ST CYR,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION TO VACATE HEARING  
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney the Acting United States Attorney for the District of Columbia, and defendant Yvonne St. Cyr, by and through her attorneys Miles Pope and Nicole Owens, hereby move this Court to vacate the status conference presently set for January 18, 2022. The parties do not believe a further status is necessary before this Court, but if the Court prefers, the parties do not object to setting a control date in approximately 45 days. The parties note that the time between now and December 15, 2021, is excluded by operation of the Chief Judge’s most recent standing order addressing the COVID-19 pandemic, No. 21-61 (BAH), and that additional tolling is appropriate based on the voluminous discovery in this case, which is still being provided. See prior motions to continue and exclude time, ECF Nos. 11, 16. In support of this motion, the parties state that Ms. St. Cyr has asked that this case be set for trial. To accomplish that, the United States will soon be seeking to file formal charges and to have a District Judge assigned, and the parties can address a trial schedule before that judge. The government is still evaluating potential charges and the defense is still receiving and reviewing the government’s discovery productions.

Undersigned counsel has consulted with counsel for Ms. St. Cyr regarding this motion. Counsel for Ms. St. Cyr has represented that the government may file this as a joint motion.

Respectfully submitted,

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