

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY GRACE,

Defendant.

Case No. 1:21-cr-00492-RDM

**JOINT STATUS REPORT AND
CONSENT MOTION TO
CONTINUE AND TOLL
SPEEDY TRIAL ACT**

NOW COMES Jeremy Grace, through his attorney, Gerald M. Needham, and respectfully files this Joint Status Report and Consent Motion to file another joint status report with the Court and/or hold a status conference on April 14, 2022, and to toll the Speedy Trial Act from February 28, 2022, until April 14, 2022. The defendant and the government agree that there is good cause to toll the Speedy Trial Act and exclude time from February 28, 2022, to April 14, 2022. The government concurs in this request and agrees that it is in its best interest. The government has reviewed this motion and agrees to the April 14, 2022, date. In support thereof, the defendant states as follows:

1. Counsel for the defendant and the government have conferred and are actively communicating in an effort to resolve this matter. The parties have made progress towards a non-trial disposition however more time is needed to finalize those discussions.
2. The parties agree that this stipulation and any order resulting therefrom shall not affect any previous order of pretrial release.
3. The parties jointly ask that they be allowed to file another joint status report with the Court and/or hold a status conference on or before April 14, 2022, to update the Court further on

the status of this matter. Mr. Grace is in full compliance with all conditions of his pretrial release.

4. The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from February 28, 2022, through April 14, 2022, shall be excluded in computing the date for speedy trial in this case.

Respectfully submitted on February 25, 2022.

/s/ Gerald M. Needham

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ORDER

This matter having come before the Court pursuant to a Joint Status Report and Consent Motion to Continue and to Toll Speedy Trial Act, it is therefore

ORDERED that good cause exists to extend the time for the filing of an additional status report and/or to hold the next status conference.

ORDERED that the period from February 28, 2022, through April 14, 2022, shall be excluded computing the time under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. §§ 3161(h)(1) & (h)(7). The Court finds that COVID-19 has presented complications here that make it difficult for defense to meet with his client and prepare, that there is voluminous and evolving discovery, and that delay is necessary for the parties to work on a potential resolution.

It Is So Ordered.

Randolph D. Moss
United States District Court Judge

Entered: _____

ORDER