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

UNITED STATES OF AMERICA :

v. : CASE NO. 21-CR-035 (RC)

RONALDO COLTON MCABEE, :

Defendant. :

## JOINT MOTION TO SCHEDULE CHANGE OF PLEA HEARING AND STAY PRETRIAL DEADLINES

The United States of America, by and through its undersigned counsel, and defendant Ronald Colton McAbee, through his counsel, Benjamin Schiffelbein, Esq., respectfully request that this Court convert the pre-trial conference currently scheduled for September 13, 2023 at 11:00 a.m. to a change of plea hearing and that the Court stay the outstanding pretrial filing deadlines.

Respectfully Submitted,

MATTHEW M. GRAVES United States Attorney D.C. Bar No. 481052

/s/ Benet J. Kearney

Benet J. Kearney
NY Bar No. 4774048
Alexandra F. Foster
DC Bar No. 470096
Assistant United States Attorneys
601 D Street, N.W.
Washington, D.C. 20530
(212) 637 2260 / (619) 546 6735
Benet.Kearney@usdoj.gov /
Alexandra.Foster@usdoj.gov