

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	CRIMINAL NO.: 20-143
Plaintiff,	:	
	:	
vs.	:	HONORABLE JOHN M. GALLAGHER
	:	
	:	
JEREL ANDRE WILLIAMS,	:	
	:	
Defendant.	:	

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL DATE

Jerel Andre Williams, by his counsel undersigned, respectfully requests that the Court continue the trial. In support of this request, it is stated:

1. On October 23, 2020, Mr. Williams was arraigned before The Honorable Lynne A. Sitarski, Magistrate Judge and entered a plea of not guilty to the instant superseding indictment.
2. The trial is scheduled to begin on June 4, 2021.
3. The defense has requested and received 49,000 pages of discovery and the case has been designated as complex. The defense needs additional time to review the discovery materials, speak with Mr. Williams, conduct any necessary investigations, determine if a non-trial disposition is possible or prepare for trial.
4. Additionally, Mr. Williams has been caring for his son who has recently begun radiations for malignant soft tissue sarcoma and whose treatment will extend into the fall.
5. A continuance until not less than December 1, 2021 is respectfully requested.
6. Assistant United States Attorney Michael Lowe has no objection to this continuance motion.
7. Defense counsel stipulates that the time from the filing of this motion until the trial date is excludable time pursuant to 18 U.S.C. § 3161(h)(7).

Dated May 14, 2021

Respectfully Submitted,

/s/ Troy A. Archie, Esquire

archie@aafnjlaw.com

Counsel for Jerel Andre Williams

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	CRIMINAL NO.: 20-143
Plaintiff,	:	
	:	
vs.	:	HONORABLE JOHN M. GALLAGHER
	:	
JEREL ANDRE WILLIAMS,	:	CERTIFICATE OF SERVICE
	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Troy A. Archie, Esquire., hereby certify that this Motion for a Continuance was served Pacer/ECF and via electronic mail Michael Lowe, A.U.S.A. (via email/mike.lowe@usdoj.gov).

Dated: May 14, 2021

/s/ Troy A. Archie
TROY A. ARCHIE, ESQUIRE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
Plaintiff	:	
v.	:	
	:	CRIMINAL NO. 20-143 (JMG)
	:	
JEREL ANDRE WILLIAMS	:	
Defendant	:	

ORDER AND NOW, this _____ day of , _____ 2021, upon consideration of the Defendant's Unopposed Motion for Continuance of Trial Date, it is hereby **ORDERED** that the motion is **GRANTED**. The Court finds that the defense need additional time to obtain and review discovery as well as defendant having a family medical issue. Pursuant to 18 U.S.C. § 3161(h)(7), the Court finds that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial. Trial in this matter shall begin on the _____ day of, _____ 20__

BY THE COURT:

Hon. John M. Gallagher
United States District Court