IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CASE NO. GLS-21-2249**
	*	
SHERRIE LYNNE BRYANT,	*	
	*	
Defendant	*	
	*	
	*******	

SECOND CONSENT MOTION TO CONTINUE
PRELIMINARY HEARING AND WAIVE FILING OF INDICTMENT

The United States of America, by and through the undersigned attorney, hereby requests an order continuing the Preliminary Hearing and the deadline for filing an indictment in this matter until February 12, 2022. In support of this motion, the Government states as follows:

1. On August 24, 2021, Defendant was charged by Criminal Complaint with wire fraud, in violation of 18 U.S.C. § 1343; and false statements, in violation of 18 U.S.C. § 1001.

2. On August 25, 2021, an Initial Appearance was held before the Honorable Magistrate Judge Gina L. Simms. The Defendant was ordered released on conditions and a preliminary hearing was scheduled for September 15, 2021.

3. Pursuant to Fed. R. Crim. P. 5.1(c), a preliminary hearing must be held no later than 14 days after the initial appearance if the Defendant is in custody, or no later than 21 days if the Defendant is not in custody.

4. Pursuant to the Speedy Trial Act, the Government must file an indictment or information resulting from the charge against Defendant within thirty days of her arrest. *See* 18 U.S.C. § 3161(b).

5. Federal Rule of Criminal Procedure 5.1(d) provides, "With the defendant's consent and upon a showing of good cause—taking into account the public interest in the prompt disposition of criminal cases—a magistrate judge may extend the time limits in Rule 5.1(c) one or more times. . . ."

6. The Government and counsel for the Defendant have discussed the preliminary hearing and Speedy Trial deadlines. The Defendant, through counsel, agrees that the time within which a preliminary hearing must be held or an indictment filed may be extended to and including February 12, 2022.

7. The Government submits that there is good cause to extend the time in which it must file an indictment or the Court must hold a preliminary hearing. Discovery in this case is voluminous and the requested extension would allow the Defendant an opportunity to review and discuss the discovery with counsel. The parties are also engaged in plea negotiations and therefore an extension will provide the parties the opportunity to discuss a possible resolution of this case in lieu of trial, which would serve the public interest in prompt disposition of criminal cases. *See* Fed. R. Crim. P. 5.1(d); 18 U.S.C. § 3161(h)(7).

8. A proposed order is submitted herewith.

Based on the foregoing, the Government respectfully requests that the Court grant this Motion and continue the Preliminary Hearing in this matter and the deadline for filing an indictment until February 12, 2022.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: /s/
Rajeev R. Raghavan
Assistant United States Attorney