UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	**M.B.D. Case No.**
	)	**1:21-mj-02139-MBB**
LILLY NGUYEN,	)	
	)	
Defendant	)	

JOINT MOTION FOR ENDS-OF-JUSTICE CONTINUANCE OF TIME FOR FILING AN INDICTMENT OR INFORMATION, AND EXCLUSION OF TIME, UNDER THE SPEEDY TRIAL ACT

The United States of America, by and through Assistant United States Attorney Christopher Markham, and the defendant through undersigned counsel, respectfully move this Court to grant a continuance of the time within which an indictment or information must be filed, and exclude the time period from May 10, 2021, through and including June 14, 2021, from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A), and Sections 5(b)(7)(B) and 5(c)(1)(A) of the *Plan for Prompt Disposition of Criminal Cases* for the United States District Court for the District of Massachusetts (effective December 2008), on the ground that the ends of justice served by granting the requested continuance and excluding these periods outweigh the best interests of the public and the defendant in a speedy trial. The parties further ask this Court to issue the attached proposed *Order of Continuance and Excludable Delay*. In support of this request, the parties state as follows:

1. This matter was initiated by criminal complaint on April 8, 2021. The parties have been engaged in preliminary discussions regarding the possible resolution of this matter that might obviate the need for an indictment.

2. The requested exclusion of time will permit defense counsel to adequately confer with the defendant, and allow the parties to further discuss and finalize the terms of any resolution, before the government is required to seek an indictment.

3. The parties agree that, if the requested time is excluded, the government has until June 15, 2021 to return an indictment in this case. No previous extensions have been requested.

4. The defendant is not being held in custody on the basis of the complaint.

5. A proposed order is attached.

Respectfully submitted,

LILLY NGUYEN
By her attorney,

/s/ Aviva E. Jeruchim
AVIVA E. JERUCHIM

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Christopher J. Markham
CHRISTOPHER J. MARKHAM
Assistant U.S. Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

By: /s/ Christopher J. Markham
CHRISTOPHER J. MARKHAM
Assistant U.S. Attorney