

RESPONSE

On April 22, 2021, the Court scheduled a status hearing for June 22, 2021, at 11:00 a.m. Counsel for Defendant is currently engaged in trial before The Honorable Chris Brown, Franklin County Court of Common Pleas, in the matter of State of Ohio v. James Tappan, Case No. 19 CR 5014. On Tuesday, June 23, 2021, trial was to have resumed at 9:00 a.m. I anticipated that the testimony of the State's two witnesses would be short and completed well in advance of the 11:00 a.m. status hearing. Unfortunately, four jurors were late, delaying the start of trial by 30 minutes. As a result, I was unable to join the status conference until approximately 11:14 a.m. at which time it had already been concluded. I recognize both that jury trials can be unpredictable and that it was my responsibility to ensure I was available for the status hearing. Thus, I take full responsibility and apologize for the inconvenience caused to the Court, the government, and to my client. Although not an excuse, my tardiness was not deliberate.

Respectfully submitted,

/s/ Samuel H. Shamansky
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Response to Order to Show Cause was filed with the Clerk of Court for the United States District Court for the District of Columbia using the CM/ECF system, which will send

notification of such filing to William Kennelly Dreher, 700 Stewart Street, Suite 5220, Seattle, Washington, 98101 on June 23, 2021.

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY