UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

CRIMINAL ACTION NO. 1:21-CR-00281-JEB

UNITED STATES OF AMERICA

PLAINTIFF

Vs.

JORDAN T. REVLETT

DEFENDANT

MOTION TO CONTINUE STATUS CONFERENCE

Comes the defendant, Jordan T. Revlett, by and through counsel, and hereby moves this Court to continue the Status Conference currently scheduled for December 9th, 2021, at 11:00 A.M. EST As grounds for such, the defendant states the following:

Previously when the defendant appeared before the Court for a Status Conference, the undersigned informed the Court that additional time was required to review additional discovery received from the United States with the defendant. Additionally, it was conveyed to the Court that a trial in this matter was not anticipated at the time. Due to obligations relating to other cases the undersigned is currently counsel of record on, the undersigned has not be able to finalize review of the all of the previously mentioned discovery in this matter with the defendant. However it is not anticipated that a lengthy continuance is required to finalize discovery review with the defendant. The undersigned submits to the Court that a thirty (30) to forty-five (45) day continuance would enough time.

It must also be noted that portions of the previously mentioned discovery, are subject to the protective order (DN 27), entered by this Court. Pursuant to said Order, that discovery must be

reviewed with the defendant in-person which was recently difficult to accomplish, due to the undersigned's other representation obligations.

Finally, the undersigned states to the Court that certain and several administrative issues arose with the operation and management of the undersigned's legal firm. These issues were outside the typical dealings and issues associated with operation and management of my firm and required more attention and time than anticipated which compounded the previously mentioned issues.

The undersigned further states to the Court, that this Motion was discussed with counsel for the United States, and that no objection would be made. Furthermore, the defendant would stipulate that the time between December 9th, 2021 and the requested next scheduled Status Conference date is excludable under the Speedy Trial Act in the interest of justice.

WHEREFORE, based on the foregoing, the Defendant respectfully moves this Court to Enter an Order granting the relief requested herein.

Respectfully submitted,

/s/ Bryce L. Caldwell

Bryce L. Caldwell (KY #92874) Gordon, Goetz, Johnson & Caldwell, PSC 121 West 2nd Street Owensboro, Kentucky 42303

Office: (270) 684-5757 Cell: (270) 231-7513

Fax: (270) 684-5862

Email: <u>bcaldwell@glofirm.com</u>

Counsel for Defendant

And

/s/ Janet K. DeCosta
Janet K. DeCosta
D.C. Bar # 439674
2425 L Street, N.W.
Suite 901
Washington, DC 20037
Telephone: (202) 638-3344
Facsimile: (202) 824-8126

Email: jkdecosta@jkdecosta.com Co-Counsel for Defendant

NOTICE

The foregoing will come on for hearing at the discretion of and convenience of the Court.

CERTIFICATE OF SERVICE

I hereby certify that on December 7th, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of the electronic filing to all parties of record.

Hon. Kathryn E. Fifield Trial Attorney Detailed to the U.S. Attorney's Office 555 4th Street NW Washington, DC 20530 kathryn.fifield@usdoj.gov (202) 320-0048

Respectfully submitted,

/s/ Bryce L. Caldwell
Bryce L. Caldwell (KY #92874)
Counsel for Defendant

And

/s/ Janet K. DeCosta
Janet K. DeCosta
Co-Counsel for Defendant