UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

•

v. : Criminal No. 21-CR-79-BAH

:

KEVIN JAMES LYONS,

.

Defendant.

JOINT RESPONSE TO MINUTE ORDER

The undersigned parties hereby jointly respond to the Minute Order dated May 27, 2022, directing the parties to "inform the Court by June 3, 2022," whether any outstanding plea offer will have expired by June 10, 2022, and, if so, provide the Court with three proposed trial dates.

In accordance with the Minute Order, the parties hereby notify the Court that the government has extended a plea offer to the defendant that has not expired. To allow sufficient time for the Defendant to consider the plea offer, the parties will separately move this Court for a 60-day continuance of the Status Conference set for June 10, 2022.

Respectfully submitted,

/s/

Lawrence Wolf Levin Law Office of Lawrence Wolf Levin 214 Ohio Street #5 Chicago, IL 60654 312-236-7543 lwlwolflaw@gmail.com

and

MATTHEW M. GRAVES United States Attorney

DC Bar No. 481052

/s/ Benjamin Kringer Benjamin E. Kringer By:

Detailed to the U.S. Attorney's Office

for the District of Columbia

D.C. Bar No. 482852

601 D St NW

Washington, DC 20579

benjamin.kringer2@usdoj.gov

(202) 598-0687