

UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No.: 1:21-cr-00128-RC
	:	
WILLIAM POPE, and	:	
MICHAEL POPE,	:	
	:	
Defendants.	:	

**JOINT MOTION TO CONTINUE MAY 19, 2022 STATUS
HEARING AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this joint motion to continue the status conference in the above-captioned matter. The Government and the Defendants agree that there is good cause to extend the status conference presently scheduled for May 19, 2022, at 9:30 am before the Honorable Rudolph Contreras, United States District Court Judge. Respectfully, the parties request that the status conference be rescheduled to a date after July 18, 2022. Each defendant agrees with this request and believes that the continuance is necessary for the reasons stated herein.

In January 2022, the defendants retained new counsel. *See* ECF Nos. 48-49. Thereafter, the Government provided new counsel with discovery. As a result of this discovery review, the parties have identified additional reports that need to be disclosed including the interview of witnesses specific to this case. The parties believe that a continuance is necessary so that the parties can review discovery and engage in discussion about the evidence in this case.

The parties respectfully propose a status conference reset to July 19, July 20, or July 21. The parties also request that the status conference be conducted remotely by video because the defendants reside in Kansas and Idaho.

The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from May 19, 2022, to the date set by this Court, shall be excluded in computing the date for speedy trial in this case.

By the filing of this motion, the Government represents that counsel for the Defendants: Gregory B. English for William Pope, and Bruce H. Searby for Michael Pope, agree with this motion.

Respectfully submitted this 11th day of May, 2022.

MATTHEW M. GRAVES
UNITED STATES ATTORNEY

By: /s/ Jason M. Crawford
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ORDER

Based upon the representations in the Joint Motion to Continue and to Exclude Time Under the Speedy Trial Act, and upon consideration of the entire record, the Court finds that it would best serve the interests and ends of justice and outweighs the interests of the public and the Defendants in a speedy trial to continue this matter to allow the parties to continue to review discovery and discuss any potential pre-trial resolution.

Therefore, it is this _____ day of May, 2022,

ORDERED that the Joint Motion to Continue and to Exclude Time Under the Speedy Trial Act, is hereby **GRANTED**; it is further

ORDERED that this proceeding is continued to _____, 2022, at _____; and it is further

ORDERED that the time period from the date of this Order through and including the date of the next hearing is hereby excluded from the computation of time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

It Is So Ordered.

THE HONORABLE RUDOLPH CONTRERAS
UNITED STATES DISTRICT COURT JUDGE

Entered: _____