

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Crim. No. 21-CR-232 (CRC) |
| | : | |
| RICHARD MICHETTI, | : | |
| <i>Defendant.</i> | : | |

JOINT MOTION TO CONTINUE STATUS CONFERENCE

The United States of America, by and through the United States Attorney for the District of Columbia, and Richard Michetti, the Defendant by and through his counsel, Perry DeMarco, Sr. respectfully move this Court to continue the status conference set for March 31, 2022, at 3:00 pm in this matter for a period of thirty (30) days. The parties further move the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this unopposed motion, the government now states the following:

1. On March 29, 2022, the undersigned counsel for the government for the government was contacted by the office of Mr. DeMarco, who is out of state.
2. Mr. DeMarco is currently on a sailing trip and has had engine and mechanical difficulties with the boat. He is scheduled to be towed into St. Augustine, FL in the early evening of March 29, 2022.
3. The defense asked the government for help in filing a Motion to Continue the status hearing. The undersigned agreed to assist and due to the circumstances, joins in the request for a continuance.
4. The undersigned counsel and defense counsel are presently in plea negotiations with ongoing discussions. The government has also just received a scoped download of the

defendant's telephone, which must be copied to a disk and sent to Mr. DeMarco. A continuance of at least 30 days would provide additional time for the parties to sort out these issues and continue conferring on a possible resolution of the case, which is presently set for trial on July 18, 2022.

5. Mr. DeMarco's office has relayed that the defendant concurs with this request for a continuance.

6. Should the Court agree to grant this motion the parties are available April 25th, May 4th or May 6th of 2022.

7. The parties also move the Court to exclude the period from March 31, 2022, until the continuance date from the computation of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B) for the reasons the government herein and because the continuance will further talks aimed at a pretrial disposition. The parties also request the Court find that the ends of justice served by granting this continuance outweighs the best interests of the public and the defendant in a speedy trial.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court GRANT this unopposed, joint motion to continue the status conference, and request that the Court exclude the period from March 31, 2022, until the next Court date from the computation of time under the Speedy Trial Act.

Respectfully submitted,

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BY: /s/ Mona Lee M. Furst
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