## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

	)	
UNITED STATES OF AMERICA,	)	
	)	Criminal No. 1:21-cr-00537-TJK
v.	)	
	)	
RYAN SAMSEL,	)	
	)	
Defendant.	)	
	)	

## CONSENT MOTION TO SET STATUS HEARING AND CONTINUE MOTIONS DEADLINES

The United States of America, jointly with the undersigned counsel for Defendants Ryan Samsel and James Tate Grant, respectfully request this Court set a status hearing as soon as is practicable and for an extension of time within which to file pretrial motions.

The Court last held a status hearing in this matter on November 23, 2021. At that time, defense counsel advised that pretrial motions could be filed by today, December 17, 2021.

Yesterday, December 16, 2021, the Government files its Second Superseding Indictment in this matter (ECF No. 69), adding James Tate Grant as a defendant.

Defense counsel has conferred with the Government and the parties agree that rather than file pretrial motions as to one defendant, respectfully request that the Court set a status conference at which all parties can address the schedule in this case.

Accordingly, the parties jointly request that the Court set a status conference as soon as is practicable and further Order that Defendant Ryan Samsel be permitted to file pretrial motions at a date to be determined by the Court at the Status Conference or soon thereafter.<sup>1</sup>

[SIGNATURE ON NEXT PAGE]

<sup>&</sup>lt;sup>1</sup> Of note, Mr. Samsel remains detained at the Northern Neck Regional Jail in Warsaw, Virginia, and would therefore still be available by video for a status conference.

Dated: December 17, 2021

/s/ April Nicole Russo

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Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

On December 17, 2021, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.

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