

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 21-cr-00451-CJN
	)	
SUZANNE IANNI,	)	
Defendant	)	

**MOTION TO CONTINUE**

Now comes counsel for Suzanne Ianni and respectfully moves to continue the Status Conference scheduled for November 30, 2021. The government does not object.

As reasons therefore,

- 1) The government has provided counsel with four (4) recent productions of discovery – September 27, October 26, November 1, and November 8.
- 2) Counsel has not had adequate opportunity to review the materials.
- 3) He has been on two consecutive trials – a Massachusetts state homicide case (1973CR00089 – Bristol County Superior Court) and a fraud trial in the United States District Court, District of Massachusetts (19-cr-10099-NMG). Counsel is scheduled to soon begin a trial in another Massachusetts state court (2077CR000162 – Essex County Superior Court on December 13, 2021).
- 4) Counsel requests that the Court set a date for a further Status Conference in approximately 60 days.
- 5) The defendant agrees that the time between now and the next date be excluded from the calculations under 18 U.S.C. §§3161(h)(7)(A). The ends of justice served in the delay outweigh the best interest of the public and Mrs. Ianni in a speedy trial. Exclusion of the time is necessary so that counsel and the defendant can review the new discovery.
- 6) The government, through Assistant United States Attorney Stuart Allen, does not object to the continuance.

Respectfully submitted,  
SUZANNE IANNI,  
By her attorney,  
Pro Hac Vice

Date: November 24, 2021

/s/ Henry Fasoldt  
C. Henry Fasoldt, BBO# 667422  
185 Devonshire Street, Ste. 302  
Boston, MA 02110  
henry@bostondefenselaw.com  
617-338-0009 – office

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, November 24, 2021

/s/ Henry Fasoldt  
Henry Fasoldt