

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

UNITED STATES OF AMERICA

v.

WILLIAM DUNFEE,

Defendant

Case No. 22-mj-217 (MAU)

**JOINT MOTION TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through undersigned counsel, the United States Attorney for the District of Columbia, and defendant William Dunfee, by and through his attorney Curt C. Hartman, hereby file this motion to continue the status conference set for Thursday, January 12, 2023, in the above-captioned matter, for approximately 30 days, until Thursday, February 16, 2023; and to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* The parties request the additional time to engage in plea negotiations and review preliminary discovery productions.

1. The defendant's initial appearance in the District of Columbia was held on October 20, 2022, before Magistrate Judge Robin M. Meriweather. During the hearing, the defendant indicated that he wished to retain counsel and would update the Court once counsel had been retained.
2. On December 7, 2022, Mr. Hartman filed notice of appearance for the defendant.
3. On December 16, 2022, the government produced case-specific files to the defendant via USAfx, including open-source videos and images.

4. Counsel for the defendant does not oppose the proposed protective order filed in conjunction with the instant motion. Once the protective order is in place, the government intends to provide the defendant with additional case-specific discovery.
5. The government is engaged in productive pre-indictment plea discussions with the defense and expects those discussions to continue in the near future.
6. Given the discovery recently produced, and entry into plea negotiations, the parties ask for an additional 30 days to work toward a resolution in this matter.

The parties request that the Court exclude the time until the status conference on February 16, 2022, pursuant to 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

Date: December 19, 2022

By: /s/ Will N. Widman
WILL N. WIDMAN
Trial Attorney, Detailee
NC Bar No. 48158
1301 New York Avenue, NW, 8th Floor
Washington, D.C. 20530
(202) 353-8611
Will.Widman@usdoj.gov

On behalf of the Defendant:

/s/ Curt C. Hartman
CURT C. HARTMAN
The Law Firm of Curt C. Hartman
Bar No. OH0040
7394 Ridgpoint Drive, Suite 8
Cincinnati, OH 45230
(513) 379-2923
hartmanlawfirm@fuse.net

CERTIFICATE OF SERVICE

On this 19th day of December, 2022, a copy of the foregoing was served on counsel of record for the defendants via the Court's Electronic Filing System.

WILL N. WIDMAN
Trial Attorney, Detailee
NC Bar No. 48158
1301 New York Avenue, NW, 8th Floor
Washington, D.C. 20530
(202) 353-8611
Will.Widman@usdoj.gov