

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-378 (TJK)
v.	:	
	:	
ARTHUR JACKMAN et al.,	:	
	:	
Defendants.	:	

JOINT MOTION TO CONTINUE STATUS HEARING

A status hearing in the above-captioned case is currently scheduled for February 2, 2023. The government and the defense are continuing to work diligently to discuss pre-trial disposition options and we require additional time to facilitate these efforts. The government is also continuing to provide discovery to the defense for review. Accordingly, we are requesting this status hearing be continued to a date in approximately 90 days.

The parties request that the Court exclude the time until that next status hearing from the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). Counsel for the defense and for the government require additional time to review the discovery that has been provided to date, and to permit the defendants to review that material, some of which is designated “Highly Sensitive” pursuant to the protective order.

Accordingly, the parties now jointly move this Court to continue this case until a date in approximately 90 days. Such a continuance will allow for the continued provision and review of discovery in this unusual and complex case, and will grant counsel for the defendants and the attorneys for the government the reasonable time necessary for effective preparation, taking into

account the exercise of due diligence. Proceeding to trial without such a continuance would be likely to result in a miscarriage of justice, would make it unreasonable to expect adequate preparation for pretrial proceedings and trial itself due to the unusual and complex nature of the prosecution, and would deny counsel for all parties the time necessary for effective preparation.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY

/s/ Nadia E. Moore

Nadia E. Moore
Assistant United States Attorney, Detailee
N.Y. Bar No. 4826566
271 Cadman Plaza East
Brooklyn, NY 11201
(718) 254-6362

/s/ William Shipley

William Lee Shipley, Jr.
Law Offices of William L. Shipley
PO Box 745
Kailua, HI 96734
808-228-1341

Counsel for defendants Nathaniel Tuck and Kevin Tuck

/s/ Eugene Ohm

Eugene Ohm
Federal Public Defender for the District of Columbia
625 Indiana Avenue, NW, Suite 550
Washington, DC 20004
(202) 208-7500

Counsel for defendant Arthur Jackman

/s/ Michael E. Lawlor

Michael E. Lawlor
Brennan, McKenna & Lawlor, Chartered

6305 Ivy Lane, Suite 700
Greenbelt, MD 20770
(301) 474-0044

/s/ Nicholas G. Madiou

Nicholas G. Madiou
Brennan, McKenna & Lawlor, Chartered
6305 Ivy Lane, Suite 700
Greenbelt, MD 20770
(301) 474-0044

Counsel for defendant Edward George

/s/ James Lee Bright

James Lee Bright
Barrett Bright Lassiter Linder
3300 Oak Lawn Avenue, Suite 700
Dallas, TX 75219
(214) 720-7777

/s/ Phillip A. Linder

Phillip A. Linder
Barrett Bright Lassiter Linder
3300 Oak Lawn Avenue, Suite 700
Dallas, TX 75219
(214) 252-9900

Counsel for defendant Paul Rae