

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-cr-52-3 (TJK)**
 :
 MATTHEW GREENE, :
 :
 Defendant. :

**GOVERNMENT’S UNOPPOSED MOTION TO
TO LATE FILE JOINT STATUS UPDATE**

The United States of America, by and through its attorney the United States Attorney for the District of Columbia, hereby moves this Court to accept the attached joint status report for late filing, as it was due to be filed yesterday, June 22, 2022.

On March 10, 2022, the Court directed the parties to file a joint status update on Greene’s cooperation, which the parties neglected to do. That failure was an oversight by both counsel, and both parties apologize to the Court for it. The Court *sua sponte* then directed the parties to file that update by June 22, 2022. *See* Minute Order dated June 15, 2022. On June 22, 2022, undersigned counsel was traveling at the time the joint update was finalized, and due to arrive in the D.C. area around 7:30 p.m., but all flights into the D.C. area were either canceled or postponed due to stormy weather. Undersigned counsel attempted to connect at the airport to timely file the notice, but was unable to connect to the Internet prior to the midnight deadline to file on June 22, 2022. As a result, counsel seeks leave to file the attached joint status update one day late and again apologizes to the Court for the tardy filing.

Undersigned counsel has spoken to Michael Kasmarek, Esq., who represents the defendant, and Mr. Kasmarek represented that he does not oppose the relief requested in this motion, that is that the Court accept for late filing the attached joint status update.

WHEREFORE, for the foregoing reasons, the government asks that the Court accept for filing, one day late, the attached joint

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Erik M. Kenerson
Erik Kenerson
Assistant United States Attorney
Ohio Bar No. 82960
601 D Street NW, Room 5.130
Washington, DC 20530
Erik.Kenerson@usdoj.gov
(202) 252-7201