

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JONATHAN J. MUNAFO,
Defendant.

Criminal Case. No.: 21-330 (JEB)

MOTION FOR EXTENSION OF TIME TO SUBMIT STATUS REPORT

The parties' joint status report is due today, November 9, 2021. A brief, three-week extension is requested as several pending matters may alter the course of the case. They will, at least, be relevant to the pending status report.

Notably, the parties are discussing possible dispositions and awaiting a psychological report by a BOP mental health practitioner. It is due November 23, 2021 and was ordered in Mr. Munafó's Western District of Michigan matter. As mentioned in our September 10, 2021 filing, the parties have discussed a possible global resolution but the psychological evaluation, along with several other factors, has delayed more detailed discussions.

As such, we believe a three-week extension is in the interest of judicial economy as it would allow time to consider these new developments before submitting a more detailed status report to the Court.

If this request is granted to November 30, 2021, the parties would request that the Speedy Trial Act, if applicable, be tolled until that date.

RESPECTFULLY SUBMITTED.

Date: November 9, 2021.

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*** I HEREBY CERTIFY** that on this date I e-filed this Motion using the ECF system, which will send notification to all parties of record.