

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

United States of America,)	
)	
v.)	Case No. 21-CR-00302-CRC
)	
John Clarence Wilkerson IV,)	
)	
Defendant.)	
)	
_____)	

**JOINT UNOPPOSED CONSENT MOTION TO RESCHEDULE THE STATUS
CONFERENCE CURRENTLY SET FOR JULY 15, 2021**

Now comes Defendant, by and through his counsel, Booth M. Ripke, Nathans & Biddle, LLP, and with the express consent and authorization of counsel for the Government, AUSA Robert Juman, to file jointly on behalf of both parties this Unopposed Consent Motion to Reschedule the Status Conference currently set for July 15, 2021, at 2:00 p.m., in the above captioned case. In support of this Motion the following is asserted:

1. AUSA Robert Juman represents the Government in the above captioned case. Mr. Juman has authorized undersigned counsel to file this as an unopposed consent request to reschedule the above referenced status conference.
2. This is the first ever request to continue or reschedule any matter in this case.
3. Defendant, John Wilkerson, has been released pre-trial and is currently under courtesy supervision with the District of Maryland. Just this week, on July 12, 2021, at ECF No. 14, the Pretrial Services Agency for the District of Columbia issued a Status Report Memorandum confirming that Mr. Wilkerson “has

- reported as directed and complied with conditions of release.” ECF No. 14 at
2. All drug screens have been negative, *id.*, and there has never been any allegation of finding of any alleged violation of his conditions of release.
 4. During the prior status conference in this case, there was a waiver on the record by Mr. Wilkerson of any right to a speedy trial.
 5. Since the last status conference, undersigned counsel and AUSA Juman have been in regular and helpful discussions designed to reach a mutually agreeable resolution of this case without the need for any trial. Discovery has progressed successfully. On behalf of both counsel, undersigned counsel has been authorized to represent that progress in being made, and counsel for both parties reasonably expect a realistic probability of reaching a resolution between the parties within the next 30 days that will eliminate the need for any trial.
 6. If the status conference currently set of July 15, 2021, was cancelled and rescheduled for approximately 30 days out from that date, counsel for both parties believe there is a good chance we could reach a final agreement prior to that date, and notify the Court of a proposed resolution that would eliminate the need to plan for a trial prior to any new status conference. Unfortunately, the need to coordinate with the District of Maryland, where Mr. Wilkerson resides, has resulted in a slight delay that prevented us from having this matter reach a resolution prior to July 15, 2021.

WHEREFORE, for the above stated reasons, both counsel for the Government and undersigned counsel, jointly submit this unopposed consent motion and respectfully request that the Court:

1. GRANT this Motion;
2. CANCEL the July 15, 2021, status conference currently scheduled; and
3. Direct that this matter be set back in for another status conference in approximately 30 days time.

Respectfully Submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certified that on this 13th day of July, 2021, a copy of this Unopposed Consent Motion was served on the Office of the United States Attorney for the District of Columbia, by e-filing through the Court's CM/ECF electronic document filing system, and by courtesy email to AUSA Robert Juman, counsel for the Government.

/s/

Booth M. Ripke