

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

**UNITED STATES OF AMERICA**

**v.**

**Case No. 21-cr-331**

**KENNETH KELLY,**

**Defendant.**

---

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE**

**COMES NOW** the Defendant, **KENNETH KELLY**, by and through his undersigned attorney and moves this Honorable Court to continue the Status Conference currently set for July 8, 2021, and would state:

1. The government has informed the defendant that there is a huge volume of discovery yet to be delivered to defendant in this matter.
2. Because of the large volume of discovery, the government needs additional time to gather it, organize it and prepare it for distribution to multiple defendants involved in this same subject matter.
3. The defendant agrees that the time between this Status Conference and the newly set Status Conference is excludable time under the Rules. This case is so unusual and complex that additional time for preparation is needed. The end of justice would be served by granting this continuance. 18 U.S.C. 3161.

4. The defendant requests a 60 day continuance of the Status Conference.

5. The government has been contacted and has no objection to the 60 day continuance.

**WHEREFORE**, the Defendant, **KENNETH KELLY**, by his attorney moves on this Honorable Court to issue an order continuing the Status Conference in this matter for 60 days.

**CERTIFICATE OF SERVICE**

I **CERTIFY** that on the 7<sup>th</sup> of July, 2021, I caused a copy of the foregoing to be filed through the CM/ECF electronic filing system, thereby causing a true and correct copy of the foregoing to be delivered to the following:

[hava.mirell@usdoj.gov](mailto:hava.mirell@usdoj.gov).

**TRAGOS, SARTES & TRAGOS, PLLC**

*/s/ George E. Tragos, Esq.*

**GEORGE E. TRAGOS, ESQ.**

Florida Bar No. 184830

E-mail: [george@greeklaw.com](mailto:george@greeklaw.com)

*/s/ Peter A. Sartes, MBA/JD*

**PETER A. SARTES, MBA/JD**

Florida Bar No. 582905

E-mail: [peter@greeklaw.com](mailto:peter@greeklaw.com)

2363 Gulf to Bay Blvd, Ste 100

Clearwater, FL 33765

PH: (727) 441-9030

Secondary E-mail: [naomi@greeklaw.com](mailto:naomi@greeklaw.com)

