

hardship for him in terms of trial preparation. Accordingly, he objects to changing the trial date to an earlier date.

5. Undersigned counsel for Mr. Bledsoe is involved in a number of very serious cases that are putting high demands on his time. When trial was scheduled in this case for August 1, 2022, counsel budgeted his time for this case and those cases with that trial date in mind. In doing this, counsel made a point to keep the two weeks leading up to the trial in this case as free as possible on his calendar so that he could make sure he had time to prepare for trial. Counsel feels that it is particularly important in this case to block off time before trial because the government is still providing discovery to counsel and uploading it to the Deloitte/Relativity database. While government counsel have been good about getting discovery to counsel as it comes into their possession and about pointing out to counsel the discovery they believe is pertinent, counsel still owes a duty to Mr. Bledsoe to review the discovery that is continuing to come in to look for evidence beyond the evidence the government thinks is pertinent that might be relevant to the defenses he is planning to make.

6. Currently, the biggest cases that counsel is handling that are in a pretrial posture are United States v. Darran Butler, 19-cr-137 (PWG) (United States District Court for the District of Maryland) (murder for hire and racketeering) and United States v. Ashton Briscoe, 19-cr-166 (DLF) (United States District Court for District of Columbia) (two counts of kidnapping resulting in death). When counsel was appointed to these cases, they were death-penalty cases. However, in both cases, the government has now made a “no seek” decision. The former case, in particular, is currently requiring counsel to devote a great deal of time to it, and it will continue to do so for at least the next two months. The amount of discovery is voluminous and pretrial motions are now due on July 5, 2022. This deadline was moved once before, and the

judge has indicated that he will not move it again. Additionally, counsel's co-counsel in the case has just withdrawn from the case for personal reasons, and though new co-counsel has now been brought on, that new co-counsel is not yet up to speed. Thus, counsel is having to work on the case even more than expected to fill the void that previous co-counsel's withdrawal has created.

7. Because undersigned counsel for Mr. Bledsoe took pains to keep the two-week period before the August 1, 2022 trial date as free as possible from other commitments so that he could make sure he could be prepared for trial in this case, counsel does not have any matters currently scheduled that he cannot move for the weeks starting July 18, 2022 and July 25, 2022. However, the reason that counsel's calendar is largely free for these two weeks is because counsel had budgeted them for trial preparation in this case, including the review of the discovery that is still being disclosed.

8. Especially because of the fact that the government is still providing discovery, undersigned counsel for Mr. Bledsoe already had concerns about being ready for trial on August 1, 2022.

9. While maintaining his objection to moving the current trial date of August 1, 2022 to an earlier date, undersigned counsel for Mr. Bledsoe requests that, if the trial date is moved to an earlier date, the Court give counsel as much time as possible to prepare for trial.

CONCLUSION

WHEREFORE, the defendant, Matthew Bledsoe, and the United States of America respectfully submit this joint statement regarding the Court's desire to move the start day for the trial in this case from August 1, 2022 to a day in the week starting on Monday, July 18, 2022 or the week starting on Monday, July 25, 2022.

Respectfully submitted,

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