

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

**UNITED STATES OF AMERICA** : **Case No. 1:21-cr-35-EGS**  
 :  
 **v.** :  
 :  
 **JEFFREY SABOL** :  
 :  
 **Defendant**

**DEFENDANT JEFFREY SABOL'S UNOPPOSED MOTION TO VACATE  
SCHEDULING ORDER**

Defendant Jeffrey Sabol, by and through undersigned counsel, moves this Court for an Order vacating the current scheduling Order in this matter.

Counsel for defendant Mr. Sabol has communicated with the Government on this request and the Government has no objection to the request.

Defendant Sabol has also filed an unopposed motion to be moved into the second trial group, scheduled for September 2023.

As of the filing of this motion, trial group one has two defendants set for trial, defendants Jeffrey Sabol and Peter Stager, with defendant Ronald McAbee being moved to the second group and defendants Jack Whitton and Justin Jersey accepting a plea in September.

The second group currently still has four defendants, with defendant Michael Lopatic having passed away on July 3, 2022. The second trial group is currently scheduled for September 2023.

Counsel for defendant Stager has also filed a motion to vacate the current scheduling Order in anticipation of having a stipulated bench trial.

In addition, the Government has recently provided additional discovery, some of which is directly related to Mr. Sabol's case that I need to provide to Mr. Sabol and allow him to review.

For the foregoing reasons, Defendant Sabol requests this Court vacate the current scheduling Order for pretrial motions. Defendant Sabol has no objection if Your Honor wants to schedule Mr. Sabol's case for a status to address a new pre-trial scheduling Order or have undersigned counsel submit a proposed scheduling Order.

**CERTIFICATE OF SERVICE**

Undersigned counsel hereby certifies, on Tuesday, August 30, 2022, the within motion was filed via the Court's electronic filing service.

Dated: August 30, 2022

Respectfully Submitted,

s/Alex Cirocco

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