

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

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	Case No. 21-cr-418 (RDM)
	:	
ERIC BOCHENE,	:	
	:	
Defendant.	:	

JOINT STATUS REPORT

Counsel for Mr. Eric Bochene, and the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby submit the following Joint Status Report:

Pursuant to the Court’s January 24, 2022 Minute Order, the parties conferred and submit the following:

1. The government has disclosed new evidence that may—without further clarification or context—derail the current plea negotiations.
2. Both the government and undersigned counsel agree that the best course of action is to pause further plea negotiations until additional discovery can be produced to defense counsel.
3. Upon information and belief, the government intends to produce this additional discovery as soon as it comes into the government’s possession.
4. For this reason, the parties request to submit a follow-up Joint Status Report in approximately 45 days.
5. Additionally, for the reasons outlined in the Court’s January 24, 2022 order, the parties further believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to provide discovery and the parties discuss a potential pre-trial

disposition of this matter. The parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv), as well as 18 U.S.C. § 3161(h)(1)(G). Therefore, the parties request an exclusion of time under the Speedy Trial Act from February 7, 2022, through the next scheduled status date.

6. Undersigned counsel apologizes for the tardiness in the submission of this status report.

Respectfully submitted,

By: /s/
John J. Gilsenan
Assistant Federal Public Defender
4 Clinton Sq., 3rd Floor
Syracuse, NY 13202
john_gilsenan@fd.org

/s/
Anita Eve
Assistant United States Attorney
615 Chestnut Street
Philadelphia, PA 19106
anita.eve@usdoj.gov