## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : Case No. 1:21-CR-00140-JDB

:

LARRY BROCK,

:

Defendant.

## JOINT MOTION TO CONTINUE OCTOBER 25, 2021 STATUS CONFERENCE FOR 60 DAYS

The United States of America, through counsel, and Defendant Larry Brock, through counsel, hereby move this Court to grant its Joint Motion to Continue October 25, 2021 Status Conference for 60 days. The Government and Defendant further move the Court to exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the parties state as follows:

- On June 24, 2021, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties, and that the Government would continue to supplement discovery.
- On August 25, 2021 the Court continued a Status Conference in this case as the
   Government continued to supplement discovery.
  - 3. The Government has continued to supplement discovery.
- 4. The parties have discussed the possibility of pretrial resolution of case, but have not decided upon the parameters of a plea agreement. This is a continuing discussion.
- 5. On October 21, 2021, counsel for Defendant and the United States agreed that the Court's Status Conference, which is set for October 25, 2021, should be continued for

approximately 60 days to allow the Government to continue to supplement discovery and for the Defendant and counsel to discuss a potential resolution to this case. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between October 25, 2021 and the next set Status Conference. The parties also request that the Court conduct the next Status Conference via videoconference.

WHEREFORE, for the foregoing reasons, the Government and Defendant Larry Brock, through counsel, respectfully request that the Court grant this Motion to Continue October 25, 2021 Status Conference for 60 days filed out of time, and further request that the Court exclude the period from October 25, 2021 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

s/

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and

CHANNING PHILLIPS Acting United States Attorney D.C. Bar No. 415793

By:/s/ April H. Avers-Perez
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## CERTIFICATE OF SERVICE

On this 21st day of October 2021, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ April H. Ayers-Perez
April H. Ayers-Perez
Assistant United States Attorney