## 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

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Eric Bochene, by and through his counsel, John J. Gilsenan, hereby submit this Joint Status Report as ordered by the Court.

- 1. On February 10, 2022, the government provided plea documents for consideration by the defendant and his counsel.
- 2. On March 4, 2022, the government provided newly discovered evidence to the defendant through his counsel.
- 3. Since March 4, 2022, the defendant and his counsel have discussed the proposed plea, but the defendant has not executed the plea.
- 4. Prior to March 25, 2022, the date that the Court requested to be informed as to the status of the case by both counsel, counsel for the defendant advised that the defense needed more time. Neither party filed the requested joint status report.
- 5. Given circumstances known only to the defendant, there appears to be a breakdown of communications and no meeting of the minds regarding defenses available to the defendant.
- 6. Counsel for both parties make this joint request for a status conference with the Court and propose that the conference be held any time on April 21, 2022.

- 7. The parties submit that it is in the interest of justice to continue to toll 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). Therefore, the parties request an exclusion of time under the Speedy Trial Act from March 25, 2022 through the next scheduled status date.
- 8. Counsel for both parties apologize for the tardiness in the submission of this status report.

Respectfully submitted,

MATTHEW GRAVES United States Attorney DC Bar No. 415793

By: /s/ ANITA EVE

ANITA EVE Assistant United States Attorney (Detailee) PA Bar No. 45519 615 Chestnut Street, Suite 1250 Philadelphia, PA 19106 Anita.eve@usdoj.gov (215) 764-2177

## **CERTIFICATE OF SERVICE**

On this 13<sup>th</sup> day of April, 2022, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

/s/ Anita Eve Anita Eve Assistant United States Attorney