

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

MARISSA SUAREZ, and  
PATRICIA TODISCO,

Defendants.

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Cr. No. 21-cr-00205-DLF

**JOINT MOTION TO CONTINUE STATUS HEARING**  
**AND BRIEF STATUS UPDATE**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, Marissa Suarez, by and through her attorney, Rocco C. Cipparone, Jr., and Patricia Todisco, by and through her attorney, David Bos, (collectively, “the Parties”), respectfully submits this motion to continue the status hearing, set for January 19, 2022, and as grounds therefore states:

1. On January 19, 2021, defendants were charged by criminal complaint with Entering and Remaining on Restricted Buildings or Grounds in Violation of 18 U.S.C. § 1752(a), and Violent Entry and Disorderly Conduct on Capitol Grounds in violation of 40 U.S.C. § 5104(e)(2). *See* ECF No. 1.
2. On January 27, 2021, defendants appeared in the U.S. District Court of the District of Columbia for an initial appearance. At that hearing, Magistrate Harvey issued personal recognizance bonds for each defendant subject to conditions. *See* ECF No. 9 and 10.
3. On March 3, 2021, a federal grand jury indicted the defendants on felony charges of Obstructing an Official Proceeding, in violation of 18 U.S.C. § 1512(c)(2), and Aiding and

Abetting the same, in violation of 18 U.S.C. § 2; and misdemeanor charges of Entering and Remaining on Restricted Buildings or Grounds in Violation of 18 U.S.C. § 1752(a)(1) and (2), and Violent Entry or Disorderly Conduct, and Parade, Demonstrate, or Picket on Capitol Grounds in violation of 40 U.S.C. § 5104(e)(2)(D) and (G). *See* ECF No. 16.

4. Upon discussion, the parties agreed to ask for a continuance to March 22, 2022 and provide the following update to the Court:

a. To date, the parties have participated in five status conferences. *See* Minute Entry and Orders (Mar. 18, 2021; May 21, 2021; Jul. 29, 2021; Oct. 25, 2021; and Dec. 6, 2021). In these status conferences, Marissa Suarez was represented by Paul Enzinna.

b. At each status conference, the parties have explained to the Court that discovery is ongoing, particularly regarding global discovery. In fact, “Global Discovery 9” was made available to defense counsel on or about December 22, 2021, and “Global Discovery 10” is expected on or before January 21, 2022.

c. The global discovery productions contain voluminous material that take time for counsel to digest.

d. On December 10, 2021, Attorney Rocco Cipparone filed an appearance as attorney of record for Marissa Suarez, replacing attorney Paul Enzinna. Attorney Cipparone on behalf of Ms. Suarez seeks a 60-day continuance to review and obtain discovery in this case.

e. On January 19, 2022, Attorney David Bos advised the court that Ms. Todisco’s signed plea paperwork would not be timely provided for anticipated plea hearing. Mr. Bos seeks a continuance to provide completed plea paperwork to the Court

in advance of any plea hearing.

5. Therefore, given the status of this case, which continues to remain in discovery and plea negotiations, the parties request that the next status hearing be rescheduled for March 22, 2022.

6. All parties, as part of this motion, further agree to the exclusion of time under the Speedy Trial Act until the date of the rescheduled hearing, as good cause and the interests of justice (the availability of counsel and continued provision and review of discovery) outweigh his and the public's interest in a speedy trial.

WHEREFORE, the parties respectfully requests that the January 19, 2022 status hearing in this matter be continued and that the Court find that, in the interest of justice, the time between now and the next status hearing be excluded from the speedy trial calculation.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

/s/  
GRACIELA R. LINDBERG  
Assistant United States Attorney  
Texas Bar No. 00797963  
555 4th Street, N.W.,  
Washington, D.C. 20530  
956-754-9350  
[graciela.lindberg@usdoj.gov](mailto:graciela.lindberg@usdoj.gov)

/s/  
ROCCO C. CIPPARONE, JR.  
Attorney for Marissa Suarez  
205 Black Horse Pike  
Haddon Heights, NJ 08035  
856-547-2100  
[rcipparone@cipparonelaw.com](mailto:rcipparone@cipparonelaw.com)

/s/  
DAVID BOS, Attorney for Patricia Todisco  
Assistant Federal Public Defender  
65 Indiana Avenue, N@, Suite 550  
Washington, DC 20004  
202-208-7500  
[david\\_bos@fd.org](mailto:david_bos@fd.org)