

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-00134-CJN
	:	
MARK SAHADY	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through counsel, hereby moves this Court for a 45-day continuance of the status conference currently scheduled for July 29, 2022, and to further exclude the time within which the trial must commence under the Speed Trial Act, 18 U.S.C. § 3161 *et seq.* Counsel for Defendant, Mark Sahady, does not oppose this motion.

In support of this motion, the Government states as follows:

1. On June 15, 2022, the Court set a status hearing for July 29, 2022. The Court set this case on a date and time sufficient to conduct a plea hearing if the parties were able to reach an agreement by the time of the status conference.
2. The Government extended a plea offer on July 1, 2022.
3. The United States continues to provide individualized discovery to both Defendant, as well as updated global discovery generated from other sources, including evidence from other charged defendants' devices, social media accounts, and other sources which has not yet been identified or examined.
4. The undersigned counsel and defense counsel are presently in plea negotiations. A continuance of at least 45 days would allow defense counsel time to review and consider discovery

and to engage in plea negotiations that could result in an agreeable pretrial resolution of this case that would preserve judicial resources.

5. Counsel for Defendant and the United States agree that the Court's Status Conference, which is set for July 29, 2022, should be continued for approximately 45 days to allow time for discovery production and review, and for plea discussions. Due to counsel unavailability with trials, the parties propose the following dates:

September 19, 20, 21, 22, 23, 26, 27, 28, 29, 30

6. The parties also agree to exclude from the computation of time under the Speedy Trial Act the time between July 29, 2022, and the next set Status Conference.

7. The parties request that the Court conduct the next Status Conference via videoconference.

8. The Government submits that good cause exists to continue this hearing as there is no additional information to provide to the Court regarding the status of this case. A proposed Order is attached.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the Court grant this Motion to Continue the July 19, 2022 Status Conference for 45 days filed out of time, and further request that the Court exclude the period until the next Status Conference in this case from the computation of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B), because the continuance will further talks aimed at a pretrial disposition. The Government also requests that the Court find that the ends of justice served by granting this continuance outweighs the best interests of the public and the Defendant in a speedy trial.

Respectfully submitted,

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Dated: July 28, 2022

CERTIFICATE OF SERVICE

On this 28th day of July 2022, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ Thomas Campbell
Thomas D. Campbell
Trial Attorney