UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

| UNITED STATES OF AMERICA | : |
|--------------------------|---|
| | : |
| v. | : |
| | : |
| | : |
| JASON GERDING and | : |
| | : |
| CHRISTINA GERDING., | : |
| | : |
| Defendants. | : |

Case No. 1:21-CR-00131- PLF

MOTION TO CONTINUE SEPTEMBER 8, 2021 STATUS CONFERENCE

The United States of America, through counsel, and Defendant Jason Gerding, through counsel, hereby move this Court to continue the status conference set for September 8, 2021. The government and Defendant Jason Gerding 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:

1. On June 11, 2021, the Court held a Status Conference in this case. The parties discussed that a substantial amount of discovery had been provided to the parties, and that the Government would continue to supplement discovery. The parties also discussed the possibility of resolving this case by plea agreement, which has not occurred to date.

2. On September 6 and 7, 2021, counsel for Defendant Jason Gerding and the United States agreed that the Court's Status Conference, which is set for September 8, 2021, should be continued as the parties do not have additional information to provide to the Court at this time. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between September 8, 2021 and the next set Status Conference. Counsel have been unable to reach counsel for Defendant Christina Gerding.

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3. Counsel for Defendant Jason Gerding and the United States of America request that the Court set the next Status Conference in this case for either October 8, 2021 at 3:15 p.m. EST or October 15, 2021 at anytime between 1:30 p.m. EST and 4:30 p.m. EST.

WHEREFORE, for the foregoing reasons, the Government and Defendant Jason Gerding respectfully request that the Court grant this Motion to Continue September 8, 2021 Status Conference, and further request that the Court exclude the period from September 8, 2021 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

J. KRAMER FEDERAL PUBLIC DEFENDER

By: <u>/s/ Euegene Ohm</u> EUGENE OHM Assistant Federal Public Defender 625 Indiana Avenue, N.W., Suite 550 Washington, D.C. 20004 (202) 208-7500

and

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

By:/s/ Anthony L. Franks ANTHONY L. FRANKS Missouri Bar No. 50217MO Assistant United States Attorney Detailee – Federal Major Crimes United States Attorney's Office for the District of Columbia Telephone No . (314) 539-3995 anthony.franks@usdoj.gov Case 1:21-cr-00131-PLF Document 44 Filed 09/07/21 Page 3 of 3

CERTIFICATE OF SERVICE

On this 7th day of September 2021, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/<u>Anthony L. Franks</u> Anthony L. Franks Assistant United States Attorney