

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

UNITED STATES OF AMERICA :
 :
v. : **Case No. 1:21-CR-00218-APM**
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 :
CLARK, ET AL, :
 :
 :
 :
 :
Defendant. :

**JOINT MOTION TO CONTINUE SEPTEMBER 21, 2021
STATUS CONFERENCE FOR 60 DAYS**

The United States of America, through counsel, and Defendants Matthew Clark, Christy Clark, and Paul Spigelmyer, through counsel, hereby move this Court to grant its Joint Motion to Continue September 21, 2021 Status Conference for 60 days. The Government and Defendants 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 July 21, 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.
2. The parties have discussed the possibility of pretrial resolution of case, but have not decided upon the parameters of a plea agreement.
3. On September 17, 2021, counsel for Defendants and the United States agreed that the Court’s Status Conference, which is set for September 21, 2021, should be continued for approximately 60 days. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between September 21, 2021 and the

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

4. The parties submit 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.

WHEREFORE, for the foregoing reasons, the United States and Defendants respectfully request that the Court grant this Motion to Continue September 21, 2021 Status Conference for 60 days filed out of time, and further request that the Court exclude the period from September 21, 2021 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this 20th 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/Anne Veldhuis

Anne Veldhuis

Trial Attorney