

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

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 21-cr-00563 (JDB)
)	
VICTORIA CHARITY WHITE)	
)	
Defendant.)	

MOTION FOR STATUS HEARING

COMES NOW Nicole Cubbage, as standby counsel for Ms. White, and requests a status hearing in this matter. In support of this motion undersigned counsel asserts the following:

1. On July 8, 2022, the Court granted Ms. White’s prior counsel’s motion to withdraw (ECF No. 38) and granted Ms. White’s request to proceed pro se. Ms. White is currently proceeding pro se in this case.
2. On October 17, 2022, (ECF No. 45), Ms. White was ordered to have standby counsel appointed by the Federal Public Defender solely for the purpose of facilitating her access to discovery. Undersigned counsel was appointed to aid Ms. White for this purpose and entered a notice to appear as standby counsel on October 18, 2022. (ECF No. 46).
3. After initial consultation with Ms. White, undersigned counsel was able to help her establish privileges on evidence.com to review video files pursuant to the protective order. Undersigned counsel then began to send Ms. White video links on ev.com for review. In another meeting via zoom, Ms. White was shown an index of

the large amount of video discovery in her case. During that meeting, undersigned counsel was able to review only a very small fraction of that video discovery with Ms. White, some of which requires slowing down to review adequately on a frame-by-frame basis.

4. Ms. White has now expressed a desire to have undersigned counsel appointed to represent her in this matter at trial, not just for discovery purposes as this court has previously ordered. She consents to the filing of this motion.
5. Currently this case is set for trial on January 9, 2023.
6. The current scheduling order has motions in limine due on November 30th but the date for filing substantive motions has already passed. (ECF No. 44).
7. Undersigned counsel is currently scheduled to be in trial in December (United States v. Egtvedt, 1:21-cr-177-CRC) and January (United States v. Kelly, 1:21-cr-708-RCL). Both are felony cases.
8. Undersigned counsel would need to seek a continuance to Ms. White's trial date in order to be able to accept this appointment, adequately review all the discovery with Ms. White and be properly prepared for her trial.
9. Additionally, undersigned counsel would request a new scheduling order to include a new motions deadline to file motions.
10. A status hearing is requested to discuss a potential trial date change, a new scheduling order and the request by Ms. White to change her pro se status and appoint undersigned counsel.
11. The government has no objection to this motion or a continuance to the trial date and a new scheduling order for motions.

Respectfully Submitted,

By: Nicole Cubbage

 /s/
Nicole Cubbage
DC Bar No. 999203
712 H. Street N.E., Unit 570
Washington, D.C. 20002
703-209-4546
cubbagelaw@gmail.com
Standby Attorney for Victoria White

Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 31st day of October, 2022.

 /s/
Nicole Cubbage
Standby Attorney for Victoria White