

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

UNITED STATES OF AMERICA

V.

Case No.: 21-cr-78 (EGS)

JOHN SULLIVAN

JOINT MOTION TO CONTINUE OCTOBER 28, STATUS HEARING

The parties hereby respectfully request the Court to continue the October 28, 2021 status hearing for approximately 60 days. In support thereof, the parties set forth as follows:

1. This case involves a multi-count indictment with a vast amount of discovery. The process of receiving and reviewing the discovery is proceeding in an orderly and cooperative fashion

2. There have recently been very large files of discovery produced consisting of, among other items, thousands of hours of videotapes. The files require a very significant amount of time to be reviewed and evaluated.

3. While the process of discovery review is on-going, the parties do not presently have additional information to present to the Court at a formal status hearing.

4. Counsel for the respective parties have conferred and believe that an approximately 60-day continuance of the October 28, 2021 status hearing is the best way in which to proceed.

5. The parties rely upon the discretionary powers of this Honorable Court in seeking the relief requested herein.

WHEREFORE, the foregoing considered, the parties pray this Honorable Court to continue the October 28, 2021 status hearing for approximately 60 days.

Respectfully submitted,

_____/s/_____
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_____/s/_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing was served, via the Court’s electronic filing system, on this 20th day of October, 2021 upon all counsel of record, including Candice Wong, Esquire, Assistant U.S Attorney.

_____/s/_____
Steven R. Kiersh

