

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 1:21-CR-00218-APM</b>
	:	
<b>CLARK, ET AL,</b>	:	
	:	
<b>Defendants.</b>	:	

**JOINT MOTION TO CONTINUE FEBRUARY 18, 2022  
STATUS CONFERENCE FOR 30 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 February 18, 2022 Status Conference for 30 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 January 21, 2022, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties and that the parties were working on a pretrial resolution of this case.
2. The parties have discussed a pretrial resolution of case, but additional time is needed before a resolution can be finalized.
3. On February 15, 2022, counsel for Defendants and the United States agreed that the Court’s Status Conference, which is set for February 18, 2022, should be continued for approximately 30 days. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between February 18, 2022 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 February 18, 2022 Status Conference for 30 days filed out of time, and further request that the Court exclude the period from February 18, 2022 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
DC Bar No. 481052

By: /s/Anne Veldhuis  
Anne Veldhuis  
Trial Attorney, Detailee  
CA Bar No. 298491  
450 Golden Gate Ave, Rm. 10-0101  
San Francisco, CA 94102  
Anne.Veldhuis@usdoj.gov  
(415) 307-6722

By: /s/ Elita Amato  
Elita Amato  
Counsel for Christy Clark  
DC Bar No. 442797  
2111 Wilson Blvd, 8<sup>th</sup> Floor  
Arlington, Virginia 22201  
Amato.law@comcast.net  
(703) 522-5900

By: /s/ David Bos  
David Bos  
Assistant Federal Defender  
Counsel for Matthew Clark  
DC Bar No. 421-140  
625 Indiana Ave NW # 550  
Washington, DC 20004  
David\_bos@fd.org  
(202) 208-7500

By: /s/ Allen Orenberg  
Allen Orenberg  
Counsel for Paul Spigelmyer  
DC Bar No. 395519  
12505 Park Potomac Avenue, 6<sup>th</sup> Floor  
Potomac, Maryland 20854  
aorenberg@orenberglaw.com  
(301) 984-8005

**CERTIFICATE OF SERVICE**

On this 15th day of February 2022, 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