

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

UNITED STATES OF AMERICA	:	
	:	
Plaintiff,	:	Case No. 21-CR-036
v.	:	
	:	
GINA MICHELLE BISIGNANO	:	
	:	
Defendant.	:	

JOINT MOTION FOR CONTINUANCE OF ZOOM CONFERENCE

TO THE HONORABLE CARL J. NICHOLS, JUDGE OF SAID COURT:

The Defendant, Gina Michelle Bisignano, jointly with the United States of America, by Kimberly L. Paschall, Assistant United States Attorney, respectfully move for a continuance of the Zoom conference scheduled for Wednesday, June 22, 2022 at 11:00 a.m., in the above captioned case. Both parties jointly propose a continuance date of July 12, 2022, and in support thereof, aver as follows:

1. That, in reference to the above captioned case, a Zoom conference is presently scheduled for June 22, 2022.
2. That, the date of June 22, 2022 was selected without confirming defense counsel's availability, and unfortunately, counsel for the defense, A. Charles Peruto, Jr., Esquire, has a scheduling conflict with the current date of the conference, as he will be representing a defendant in a criminal homicide jury trial in Philadelphia County before the Honorable Scott O'Keefe.
3. That, the United States of America, by Kimberly L. Paschall, Assistant United States Attorney, has no objection to defense counsel's request for a brief continuance of the conference.

- Both parties have discussed this request for a continuance and agree on their availability for the teleconference to take place the following week, however, the Court is unavailable the following week of June 27, 2022, and the Assistant United States Attorney, Kimberly L. Paschall, is unavailable the week after that, the week of July 4, 2022. Therefore, the parties have agreed to a date of July 12, 2022, as that is the next date AUSA Paschall is available.

The parties stipulate that time is ruled excludable from June 22, 2022, to July 12, 2022 for speedy trial purposes, pursuant to 18 U.S.C. § 3161.

WHEREFORE, for the foregoing reasons, both the Government and Defendant jointly request that this Court continue the teleconference currently set for June 22, 2022, to the afternoon of July 12, 2022.

Dated: 6/17/2022

Respectfully submitted,
Channing D. Phillips
Acting United States Attorney

Respectfully submitted,
Bynum & Jenkins

By: /s/ Kimberly L. Paschall
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