

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Case No. 21-CR-108 (TSC)</b>
	:	
<b>v.</b>	:	
	:	
<b>MICHAEL JOSEPH FOY,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION TO CONTINUE THE STATUS HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the above defendant, by and through his counsel, Eugene Ohm, Esq., respectfully submit this Joint Motion to Continue the Status Hearing for approximately 30 days in the above captioned matter currently scheduled for a status hearing on February 23, 2022. In support of this motion, the government relies on the following points and authorities and any other such points and authorities as may be raised at any hearing on this matter.

- 1) The Court previously set the status hearing in this matter to address further discovery matters as outlined in the defendant's filing. *See* Defendant's Notice of Filing ECF# 61.
- 2) Because undersigned counsel and counsel for the defendant are engaged in resolving any remaining discovery matters, undersigned counsel for the government and counsel for the defendant need additional time to complete all discussions regarding any further discovery matters; therefore, the parties request that the status hearing be continued for approximately 30 days or whatever date is consistent with the Court's calendar.
- 3) In that regarding, the parties respectfully are not requesting any further action at this time from the Court.
- 4) If granted, the parties will reach out to the Court's courtroom deputy to obtain the

available date(s) for the Court and parties.

5) Wherefore, the parties request the Court to continue this matter for approximately 30 days or whatever date is consistent with the Court's calendar.

Respectfully submitted,

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UNITED STATES ATTORNEY

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