

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

**UNITED STATES OF AMERICA,**

**-v-**

**DAVID JOHN LESPERANCE,  
CASEY CUSICK, and JAMES  
VARNELL CUSICK, JR.,**

**Defendants.**

Criminal No.: 1:21-cr-575 (JDB)

**DEFENDANTS' MOTION TO  
CONTINUE TRIAL**

**DEFENDANTS UNNOPOSED MOTION TO CONTINUE TRIAL**

COMES NOW, Defendants David John Lesperance, Casey Cusick, and James Varnell Cusick, Jr. (“Defendants”), by and through undersigned counsel, John M. Pierce, hereby respectfully moves the Court to grant a continuance for trial, which is currently set on June 12, 2023. Counsel respectfully requests a continuance for trial due to travel demands and the hectic trial schedules of both Counsel and his partner, Roger Roots, in which they are both juggling a number of other cases with proximate trial dates. Thus, in light of the overwhelming commitments to this case and other cases, in order to be adequately prepared, and in the best interests of the client, a reasonable continuance to the current June 12<sup>th</sup> trial date is requested. Counsel has conferred with the Government, who does not oppose the request for a continuance of the trial date, until a date that is practicable for the court in July. No harm will come to either party, the Defendants will not oppose

tolling timing, and consents to a waiver to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161.

WHEREFORE, the Defendants respectfully moves the Court, with the consent of the Government, to grant Defendants' continuance of trial due to the interests of fairness and justice.

Dated: April 30, 2023

Respectfully Submitted,

/s/ John M. Pierce  
John M. Pierce  
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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I, John M. Pierce, hereby certify that on this day, May 2, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

*/s/ John M. Pierce*

John M. Pierce