

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 1:21-cr-00222 (TFH)</b>
	:	
<b>GEORGE PIERRE TANIOS,</b>	:	
	:	
<b>and</b>	:	
	:	
<b>JULIAN ELIE KHATER,</b>	:	
	:	
<b>Defendants.</b>	:	

**GOVERNMENT’S UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO FILE RESPONSES TO DEFENDANTS’ MOTIONS,  
RESCHEDULE THE MOTIONS HEARING, AND SCHEDULE A STATUS HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests that the Court grant the government additional time to file its responses to the defendants’ motions. As grounds for this request, the government states the following:

1. On June 23, 2022, at a status hearing, the government moved orally before the Court requesting a two-week continuance of the July 27, 2022 motion hearing, and the deadlines for motions and responses. The Court granted the request and scheduled the motions hearing on August 10, 2022, with the government’s responses due on July 15, 2022, and replies due on July 29, 2022. *See* minute order dated June 23, 2022.

2. Since the status hearing, the parties have discussed certain aspects of this case and issues that may affect the motions hearing, and have made substantial progress on certain matters. The parties would like additional time to exhaust those issues.

3. Joseph Tacopina, Esquire, and Chad Seigel, Esquire, counsel for defendant Julian Khater, and Elizabeth Gross, Esquire, Linn Richard Walker, Esquire, Christopher M. Davis,

Esquire, and Aaron D. Moss, Esquire, counsel for defendant George Tanios, have no objection to this request.

4. Based on the forgoing, the parties request that the Court set this matter for a status hearing on July 27, 2022, or a date convenient for the Court with sufficient time to address certain aspects of the case, including resetting the motions hearing and motions deadlines if necessary.

Respectfully submitted,

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By: \_\_\_\_\_ /s/

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