

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-52 (TJK)
v.	:	
	:	
DOMINIC PEZZOLA,	:	
	:	
WILLIAM PEPE, and	:	
	:	
MATTHEW GREENE	:	
	:	
Defendants.	:	

**GOVERNMENT’S MOTION TO CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the Acting United States Attorney for the District of Columbia, respectfully requests that the Court continue the status conference presently scheduled for September 23, 2021, for a period of approximately 30 days. The government also requests that the Court exclude time under the Speedy Trial Act for the duration of that continuance. In support of this request, the government states the following:

Since the last status hearing in this matter, the government has continued to provide discovery most relevant (“case-specific discovery”) to the defendants in this case, and it has provided two updates on the government’s efforts to provide office-wide discovery. The government’s efforts in the latter endeavor are described in ECF Nos. 71 and 75. The government continues to make diligent efforts to comply with its discovery obligations, both with respect to case-specific discovery and office-wide discovery. The government also continues to explore potential pretrial resolutions, but it remains too early to say whether any of those discussions will be fruitful.

Given the voluminous amount of discovery in this case, the government requests that the Court continue to exclude time under the Speedy Trial Act for the reasons previously articulated by the Court at a status conference on March 26, 2021. *See* 18 U.S.C. 3161(h)(7)(A) & (h)(7)(B)(ii).

Undersigned counsel has spoken to Steven Metcalf II, Esq., counsel for Dominic Pezzola, and Michael Kasmarek, Esq., counsel for Matthew Greene, and Messrs. Metcalf and Kasmarek indicated that they do not object to a 30-day continuance or to exclusion of the Speedy Trial Act for that portion of time. The government has reached out to John Pierce, Esq., counsel for William Pepe, and as of filing the government has not been able to ascertain Mr. Pierce's position on the government's requests.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
DC Bar No. 415793

By: /s/ Erik M. Kenerson
ERIK M. KENERSON
CHRISTOPHER A. BERRIDGE
Assistant United States Attorneys
OH Bar No. 82960 (Kenerson)
GA Bar No. 829103 (Berridge)
555 Fourth Street N.W., Room 11-909
Washington, D.C. 20530
(202) 252-7201
Erik.Kenerson@usdoj.gov
Christopher.Berridge@usdoj.gov