

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 1:21-cr-382 (PLF)
 :
 CHRISTOPHER WARNAGIRIS, :
 :
 Defendant. :

JOINT MOTION TO CONTINUE TRIAL AND STAY COURT'S ORDER

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant respectfully request this Court continue the bench trial currently scheduled for November 8, 2023, to the week of January 22, 2024. The parties also request that the Court stay its latest order, ECF No. 91, regarding the defendant's second motion for *Brady* material, ECF No. 88, and the government's motion to extend time to respond to the motion, ECF No. 89. In support of these requests, the parties state that they are working to resolve the defendant's motion without further involvement by the Court. A continuation of the trial and stay of the Court's order will facilitate the parties' resolution of the motion.

In addition, today, Judge Lamberth rescheduled the jury trial in the case of *United States v. John Sullivan*, 21-cr-78, from October 30, 2023 to November 6, 2023. Judge Lamberth rescheduled the trial due to a separate ongoing trial. AUSA Lederer is representing the government in the *Sullivan* matter and she anticipates the trial lasting one week, which would conflict with the currently scheduled bench trial date in this case.

Should the Court grant this joint motion, the parties further request the Court exclude the time between the period between November 8, 2023 and through the newly set trial date for the purposes of the Speedy Trial Act, 18 U.S.C. § 3161 et seq. The ends of justice served by this exclusion outweigh the interests of the public and the defendant in a speedy trial, pursuant to the

factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,

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