

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

UNITED STATES OF AMERICA :
 : **CASE NO. 21-cr-52-2 (TJK)**
 v. :
 :
WILLIAM PEPE, :
 Defendant. :

**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 July 20, 2023, for a period of approximately 60 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:

Discovery in this case remains voluminous, and the parties continue to explore the possibility of a pretrial resolution of this case. It remains too early to say whether any of those discussions will be fruitful. Defense counsel requires additional time to discuss the case with his client and to ensure continuity of counsel if the defendant does elect to go to trial on this case

Given the voluminous amount of discovery in this case, the potential for a resolution, , 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, and subsequent status conferences. *See* 18 U.S.C. 3161(h)(7)(A) & (h)(7)(B)(ii).

Undersigned counsel has spoken to William Shipley, Esq., counsel for Mr. Pepe, and Mr. Shipley indicated that he does not object to a 60-day continuance or to exclusion of the Speedy Trial Act for that portion of time.

WHEREFORE, for the foregoing reasons, and any additional reasons as may be cited at a hearing on this motion, the government requests that the Court set this case for a further status conference in approximately 60 days, and that the Court exclude time under the Speedy Trial Act.

Respectfully submitted,

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