

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

UNITED STATES OF AMERICA,

v.

MARK SAHADY,

Defendant.

Case No. 21-cr-134 (CJN)

MOTION TO SUSPEND TRIAL DEADLINES

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia hereby respectfully requests the Court suspend remaining trial deadlines pending the resolution of the defendant's pending Motion to Withdraw and Continue Trial, ECF No. 78.

On April 24, 2023, the Court issued a Minute Order continuing the trial in this case to August 21, 2023, and set associated pretrial deadlines. Those deadlines included: (1) August 11, 2023, for Rule 404(b) notice and disclosures of grand jury, *Brady*, and Jencks Act disclosures and (2) August 14, 2023, for the joint pretrial statement. This morning, August 11, 2023, the defendant filed his Motion to Withdraw and Continue Trial. The government did not take a position on the request for withdrawal and opposed the request for a continuance. The Court then set a status conference on the defendant's motion on August 14, 2023.

Given the possibility of a change in defense counsel, the government requests that the Court suspend all remaining trial deadlines, particularly the August 11—today—and August 14 deadlines, pending the resolution of the defendant's motion. While the government is prepared to adhere to those deadlines, resetting them once the defendant's representation is resolved will ensure that all applicable pretrial negotiations, submissions, and disclosures are made directly with the defendant's trial counsel.

Current defense counsel has advised that the defendant consents to a suspension of the August 14 deadline, but not the August 11 deadline.

Respectfully submitted,

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