

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-mj-38
	:	
ALBERT CIARPELLI,	:	
	:	
Defendant.	:	

**JOINT MOTION TO CONTINUE AND
TO 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, hereby moves this Court to vacate the status conference presently scheduled for October 4, 2022, to continue the matter for approximately six weeks, and further to exclude the time within which an indictment must be filed under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest 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). The government submits that the conditions that existed when the parties have previously moved to continue status conferences, regarding the amount of discovery that must be collated, provided to, and reviewed by the defense, still exist and have grown as the government has collected more evidence in this case. *See, e.g.*, ECF Nos. 10, 13, 14, 20, 23. The government is working diligently to provide this material to the defendant, but discovery is not yet complete, and the defendant still requires time to go through the material that has been provided by the government. Additionally, counsel and the defendant have begun discussions of a potential resolution, but they need more time before they are prepared to provide an answer to that question to the government. Defense counsel has a trial set later October and needs approximately six more weeks to both handle that trial, review materials, and

