

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

UNITED STATES OF AMERICA	:	Case No. 1:21-cr-35-EGS
	:	
v.	:	
	:	
JEFFREY SABOL	:	
	:	
Defendant		

**DEFENDANT JEFFREY SABOL'S UNOPPOSED MOTION TO MOVE TO TRIAL
GROUP TWO**

Defendant Jeffrey Sabol, by and through undersigned counsel, moves this Court for an Order transferring defendant Mr. Sabol from the first trial group to the second trial group for purposes of trial in this matter.

Counsel for defendant Mr. Sabol has communicated with the Government on this request and the Government has no objection to the request.

As of the filing of this motion, trial group one has two defendants set for trial, defendants Jeffrey Sabol and Peter Stager, with defendant Ronald McAbee being moved to the second group and defendants Jack Whitton and Justin Jersey accepting a plea in September.

The second group currently still has four defendants, with defendant Michael Lopatic having passed away on July 3, 2022. The second trial group is currently scheduled for September 2023.

In addition, the Government has recently provided additional discovery, some of which is directly related to Mr. Sabol's case that I need to provide to Mr. Sabol and allow him to review.

For the foregoing reasons, Defendant Sabol requests this Court amend its pretrial Order by moving Defendant Sabol from the first trial group to the second trial group.

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies, on Tuesday, August 30, 2022, the within motion was filed via the Court's electronic filing service.

Dated: August 30, 2022

Respectfully Submitted,

s/Alex Cirocco

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