

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

**UNITED STATES OF AMERICA** :  
 : **Case No. 21-cr-589 (TFH)**  
 v. :  
 :  
**JOSEPH IRWIN,** :  
 :  
 **Defendant.** :

**JOINT MOTION TO CONTINUE PRETRIAL DEADLINES**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant, Joseph Irwin, respectfully request that this Court continue the pretrial deadlines. On January 9, 2023, the Court issued a Minute Order setting forth deadlines for pretrial filings. At that time, the trial was scheduled to commence on January 26, 2023. Since then, defendant moved for a continuance of the trial date and the Court has granted that motion, vacated the January trial date, and reset the trial date for August 14, 2023. The Court did not, however, continue the pretrial deadlines, which include filing motions *in limine*, responses, and replies; proposed voir dire; proposed preliminary jury instructions; proposed final jury instructions; proposed witness lists and names that may be mentioned in trial and proposed exhibit lists of exhibits that may be used at trial.

The parties have conferred and jointly request that the Court continue those pretrial deadlines until a date closer to trial. The grand jury returned a second superseding indictment on January 11, 2023, ECF No. 48, which requires defense to vet potential additional witnesses and adjust trial strategy accordingly. Additionally, because trial is not set until August 2023, it is possible that any proposed voir dire could change between now and August 2023, and it is also likely that matters that may require briefing in motions *in limine* could arise between now and

August 2023. Moreover, for the same reason, the parties would like additional time to prepare proposed jury instructions, proposed voir dire, and proposed witness and exhibit lists.

Therefore, the parties respectfully request that the pretrial deadlines are vacated until a later date, to be determined by the Court, closer to the trial date.

Respectfully submitted,

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Counsel for Defendant.

**CERTIFICATE OF SERVICE**

On this 18th day of January 2023, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

/s/ Ashley Akers

Ashley Akers  
Trial Attorney