

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>No. 21-cr-0509 (TSC)</b>
<b>ANTONY VO</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**JOINT MOTION TO CONTINUE STATUS CONFERENCE**

Antony Vo, through undersigned counsel, and joined with the United States Attorney for the District of Columbia, request that the status conference currently scheduled for October 22, 2021 be continued for 60 days, and time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. In support, the parties submit as follows:

1. On July 20, 2021, Mr. Vo was charged via criminal complaint with violations of 18 U.S.C. §1752(a)(1), and (2) , and 40 U.S.C. §5104(e)(2)(D), and (G) for allegations arising out of conduct on January 6, 2021. *See* ECF No. 1.
2. On July 26, 2021, Mr. Vo was placed on pre-trial release and ordered to abide by standard conditions. To this date, he has been compliant with all conditions. *See* ECF Nos. 7, 11.
3. On August 5, 2021, the government filed an Information alleging the same charges described above. Mr. Vo entered a plea of not guilty to these charges on August 10, 2021. *See* ECF No. 8.
4. On August 23, 2021, Mr. Vo appeared before this Court and both parties requested an exclusion of time until October 22, 2021 in order to obtain and review discovery.

5. In the interim, the government provided a production of discovery that has now been reviewed by counsel and the defendant. Government counsel advised that there will be more defendant specific productions provided in the near future. Defense counsel is also close to finalizing the licensing process to be able to access the voluminous video production uploaded to evidence.com referenced in the government's memorandum on discovery filed on October 13, 2021.
6. The parties request a further continuance in this matter so that the defense can review the outstanding discovery productions and to discuss potential negotiations with the government.
7. Accordingly, the parties now jointly move this Court to continue the status conference, currently scheduled for October 22 2021, for a period of 60 days. Such a continuance will allow for the continued provision and review of discovery, as well as allow the parties to continue discussions regarding a possible resolution of this matter short of trial.
8. The parties also request that time be excluded from calculation, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, until the date of the continued status conference in this matter. The parties submit that a continuance of approximately 60 days is warranted and that an order excluding time would best serve the interests and ends of justice and outweigh the interests of the public and defendant in a speedy trial pursuant to the factors described in 18 U.S.C. §3161(h)(7)(A), (B)(i), (ii), and (iv).

WHEREFORE, Mr. Vo asks in conjunction with the United States, that this Honorable Court continue the Status Conference currently scheduled for October 22, 2021. for a period of 60 days, and toll time under the Speedy Trial Act until the new hearing date.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

\_\_\_\_\_  
/s/

Maria N. Jacob  
Assistant Federal Public Defender  
D.C. Bar No. 1031486  
625 Indiana Ave. NW, Ste. 550  
Washington, D.C. 20004  
(202) 208-7500  
Maria\_jacob@fd.org

\_\_\_\_\_  
/s/

Michael J. Romano  
Trial Attorney, Detailee  
IL Bar No. 6293658  
555 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20530  
202-307-6691  
Michael.romano@usdoj.gov

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

ANTONY VO,

Defendant.

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Cr. No. 21-cr-00509 (TSC)

**ORDER**

Before the Court is a Joint Motion to Continue Status Conference. For the reasons set forth therein, it is hereby

**ORDERED** that the current status hearing set for October 22, 2021 be continued to \_\_\_\_\_, 2021 at \_\_\_\_\_ a/p.m.; and it is further

**ORDERED** that the time between October 22, 2021 and \_\_\_\_\_ 2021 be excluded from calculation under the Speedy Trial Act. The Court finds that the ends of justice served by the granting of such continuance outweigh the best interests of the public and Defendant in a speedy trial, as the continuance will provide the parties with additional time to engage in the discovery process and pretrial negotiations.

DATE:

\_\_\_\_\_  
Tanya S. Chutkan  
United States District Judge