

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 1:21-CR-639 (EGS)
	:	
ANTHONY SARGENT,	:	
	:	
Defendant.	:	

JOINT MOTION TO CONTINUE STATUS HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Anthony Sargent, by and through his attorney, John M. Pierce, respectfully move the Court to continue the status hearing currently scheduled for Friday, April 22, 2022, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the parties represent:

1. Defense counsel has represented to the government that he requires additional time to continue reviewing case-specific and global discovery with the defendant.
2. In early March 2022, a filter review team completed its review of two digital devices seized from the defendant. The FBI is still reviewing the now-filtered devices, and requires additional time to complete its review. The FBI has also represented to the government that it requires additional time to extract data from numerous additional devices that were seized from the defendant and review those forensic extractions. The government, therefore, requires additional time to complete its review of the defendant's digital devices and to make this discovery available to the defense.
3. The defendant remains on release with conditions and the parties are not aware of any issues.

4. The parties believe that the requested continuance will allow for further production and review of discovery and facilitate discussions of a potential resolution short of trial.

WHEREFORE, the parties respectfully request that this Court grant the motion for a 60-day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence 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).

Respectfully submitted,
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