

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 22-00060-BAH
	)	
VINCENT GILLESPIE	)	

**EMERGENCY<sup>1</sup> MOTION TO CONTINUE OR CANCEL STATUS CONFERENCE**  
**(ASSENTED-TO)**

Defendant, Vincent Gillespie, respectfully requests that the Court continue the status conference in this matter, now set for July 15, 2022, by one week or as soon thereafter as is convenient to the Court. Defendant alternatively requests that the Court cancel the status hearing altogether considering the Court's recent orders setting trial and a pretrial briefing schedule.

As reason therefore, undersigned counsel suffered a fractured ankle as the consequence of a hiking mishap on July 2, 2022. Treating physicians have advised surgery and undersigned counsel this day learned that the surgery, which is time-sensitive, is scheduled for this Friday, July 15, 2022, the same day as the presently scheduled status conference. Defendant therefore requests that the status conference be briefly postponed to accommodate counsel's need for the scheduled surgery.

Alternatively, defendant proposes that the Court consider canceling the status conference altogether. There are no pending discovery requests or anticipated disputes, and the Court has already scheduled a trial date and associated briefing schedule for pretrial matters. *See* Minute

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<sup>1</sup> Defendant recognizes that the Court's Standing Order [D.E. 9] requires motions to extend time or reschedule be filed within four business days of the targeted event. For the reasons set forth in this Motion, undersigned counsel respectfully requests that the requirement be waived for good cause shown. D.E. 9 at fn. 1.

Orders of July 8 & 11, 2022. The only remaining issues perceived by the parties are (1) excludable delay under the Speedy Trial Act, and (2) record acknowledgment of defendant's receipt of, and rejection of, the government's existing plea agreement offer. As to Speedy Trial Act exclusion defendant by this Motion through undersigned counsel assents to exclusion of time between July 15, 2022, and the scheduled trial date of December 19, 2022, in the interests of justice. 18 U.S.C. § 3161(h)(7)(A).

As to the government's plea agreement offer, undersigned counsel has relayed and discussed the offer with Mr. Gillespie. *See* Declaration of Timothy G. Watkins, attached hereto as Exhibit A. Mr. Gillespie has fully reviewed the terms of the proposed agreement as well as the government's avowal that the offer expires tomorrow in anticipation of the scheduled status conference. *Id.* Mr. Gillespie has declined the offer. *Id.*

Given the apparent lack of substantive matters to bring before the Court and the acknowledgment of the soon-to-be expiring plea offer, defendant submits that, should the Court deem appropriate, the status conference could be cancelled in favor of the already scheduled pretrial and trial dates.

The government assents to this Motion and leaves to the Court's discretion to either continue or cancel the presently scheduled July 15, 2022, status conference.

VINCENT GILLESPIE  
By his attorney

/s/ Timothy G. Watkins  
Timothy G. Watkins  
Federal Defender Office  
51 Sleeper Street, Fifth Floor  
Boston, MA 02210  
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 13, 2022.

/s/ Timothy G. Watkins  
Timothy G. Watkins