

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-cr-00023-TFH
	:	
CHRISTOPHER LOGSDON, et al.	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through counsel, hereby moves this Court for a 30-day continuance of the status conference currently scheduled for May 13, 2022, and to further exclude the time within which the trial must commence under the Speed Trial Act, 18 U.S.C. § 3161 *et seq.* Counsel for both Christopher Logsdon and Tina Logsdon do not oppose this motion.

In support of this motion, the Government states as follows:

1. On March 24, 2022, the Court held the first Status Conference in this case. The parties agreed to exclude from the computation of time under the Speedy Trial Act the time between March 24, 2022, and the next Status Conference, which was originally scheduled for May 2, 2022.

2. At the time that the Court scheduled the status conference, it set this case on a date and time sufficient to conduct a plea hearing if the parties were able to reach an agreement by the time of the status conference.

3. On April 7, 2022, the Court granted Defendant Christopher Logsdon's unopposed motions to continue the status hearing until May 13, 2022, and to exclude time under the Speedy Trial Act.

4. The United States continues to provide individualized discovery to both Defendants, as well as updated global discovery generated from other sources, including evidence from other charged defendants' devices, social media accounts, and other sources which has not yet been identified or examined. A fifteenth global discovery disclosure occurred this week.

5. The undersigned counsel and defense counsel are presently in plea negotiations. A continuance of at least 30 days would allow counsel time to review and consider discovery and to engage in plea negotiations that could result in an agreeable pretrial resolution of this case that would preserve judicial resources.

6. On May 11, 2022, counsel for Defendant and the United States agreed that the Court's Status Conference, which is set for May 13, 2022, should be continued for approximately 30 days to allow time for discovery production and review, and for plea discussions. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between May 13, 2022, and the next set Status Conference.

7. The parties also request that the Court conduct the next Status Conference via videoconference.

8. The Government submits that good cause exists to continue this hearing as there is no additional information to provide to the Court regarding the status of this case. A proposed Order is attached.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the

Court grant this Motion to Continue the May 13, 2022 Status Conference for 30 days filed out of time, and further request that the Court exclude the period from May 13, 2022 until the next Status Conference in this case from the computation of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B) because the continuance will further talks aimed at a pretrial disposition. The Government also requests that the Court find that the ends of justice served by granting this continuance outweighs the best interests of the public and the Defendants in a speedy trial.

Respectfully submitted,

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Dated: May 11, 2022

CERTIFICATE OF SERVICE

On this 11th day of May 2022, a copy of the foregoing was served on counsel of record for the parties via the Court's Electronic Filing System.

/s/ Thomas Campbell
Thomas D. Campbell
Trial Attorney