## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v.

DALE JEREMIAH SHALVEY,

also known as DJ

and :

: CRIMINAL NO. 21-CR-00334-TJK

TARA AILEEN STOTTLEMYER also known as TARA AILEEN

SHALVEY

:

and

:

KATHARINE HALLOCK MORRISON

:

Defendants.

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

The United States of America, by and through the United States Attorney for the District of Columbia, submits its Unopposed Motion to Continue Status Conference and to Exclude Time Under the Speedy Trial Act and states as follows:

- 1. This case is set for a Status Conference on April 19, 2022.
- The Government has supplemented the production of discovery in this case, including Global Discovery, and voluminous discovery to the last charged Defendant Katharine Hallock Morrison (Morrison).
- 3. Out of an abundance of caution, the Government has conducted "taint reviews" on the electronic devise seized from Defendants Tara Aileen Stottlemyer (Stottlemyer) and Morrison.

The taint review for Stottlemyer's devices was completed April 13, 2022, and the image of that device will be served to the parties. The taint review and substantive review of Morrison's devices has not been completed.

- 4. The Government requests the Court continue the currently set Status Conference for 45 days and to Exclude Time Under the Speedy Trial Act to allow for additional production of discovery, which will allow all the parties to engage in meaningful potential discussions on pretrial resolution of this case.
- 5. Defendants do not oppose this Motion.
- 6. The parties have identified the days of June 1-3, 2022 for the setting of the next status conference, excluding the morning of June 2, 2022 which presents a conflict for the parties.

WHEREFORE, the United States respectfully requests that this Court grant its Unopposed Motion to Continue Status Conference and to Exclude Time Under the Speedy Trial Act and reschedule it for 45 days from the date of the currently set Status Conference.

Respectfully submitted,

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## /s/Anthony L. Franks

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