

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 1:21-CR-485-BHA**
 :
KERRY WAYNE PERSICK, :
 :
 Defendant. :

**UNOPPOSED MOTION TO CONTINUE THE SEPTEMBER 30, 2021 STATUS
CONFERENCE FOR 30 DAYS**

The United States of America, through counsel, respectfully requests the Court to grant the Unopposed Motion to Continue the September 30, 2021 Status Conference for 30 days. The Government further requests the Court exclude the period of the continuance from the computation of time under the Speedy Trial Act. In support of this motion, the Government states as follows:

1. On July 30, 2021, the Court held a Status Conference in this case. The parties discussed that discovery had been provided to the parties, and that the Government would continue to supplement discovery.

2. The Government has continued to supplement discovery.

3. The parties have discussed the possibility of pretrial resolution of case, but have not decided upon the parameters of a plea agreement.

4. On September 27, 2021, counsel for Defendant and the United States agreed that the Court's Status Conference, which is set for September 30, 2021, should be continued for approximately 30 days. The parties in that discussion also agreed to exclude from the computation of time under the Speedy Trial Act the time between September 30, 2021 and the next set Status Conference. The parties also request that the Court conduct the next Status Conference via videoconference.

WHEREFORE, for the foregoing reasons, the Government and respectfully requests that the Court grant this Motion to Continue the September 30, 2021 Status Conference for 30 Days, and further requests that the Court exclude the period from September 30, 2021 until the next Status Conference in this case from the computation of time under the Speedy Trial Act.

Respectfully submitted,

CHANNING D. PHILLIPS
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By: /s/ Frances E. Blake
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CERTIFICATE OF SERVICE

On September 27, 2021, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ Frances E. Blake

FRANCES E. BLAKE

Assistant United States Attorney