

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 22-CR-55 (DLF)**
 :
MARCOS PANAYIOTOU, :
 :
 Defendant. :

**MOTION TO CONTINUE THE JULY 25, 2022 STATUS CONFERENCE AND
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this Motion to Continue the Status Conference and for Excludable Delay in the above-captioned matter, currently scheduled for July 25, 2022 at 10:00 a.m. for approximately 30 days. The Government also move to 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). In support of the motion, the government state as follows:

1. Defendant is charged by Information with offenses related to crimes that occurred at the United States Capitol on January 6, 2021.
2. On July 13, 2022, defense counsel contacted the attorney for the government stating that she will be unavailable on July 25, 2022, for the currently scheduled status hearing. Defense counsel further inquired if the parties could reschedule the hearing to later in August 2022. The government assented.
3. On the same day, defense counsel indicated she needed additional time to consult with her client about the previously extended plea offer. Defense counsel further agreed to exclude

from the computation of time under the Speedy Trial Act the time between July 25, 2022 and the next set Status Conference.

4. Additionally, since the last status hearing, the United States has continued to provide voluminous discovery in this case.

Accordingly, the government respectfully request this Court grant a 30-day continuance of the Status Conference currently set for July 25, 2022, and exclude the time within which the trial must commence under the Speedy Trial Act through and including the date of the next hearing on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and 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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