

**SUPERIOR COURT
FOR THE DISTRICT OF COLUMBIA**

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|--------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | CRIMINAL NO. 1-22-cr-149 (JEB) |
| | : | |
| ATHANASIOS ZOYGANELES | : | |
| | : | |
| _____ | : | |

JOINT MOTION TO CONTINUE STATUS HEARING

Athanasios Zoyganeles, through undersigned counsel, hereby moves this Court to continue the scheduled status hearing in the above-captioned proceeding. In support of this motion, Mr Zoyganeles states as follows:

1. Mr Zoyganeles is before the Court pending sentencing following a guilty plea to count 4 of the Information: Demonstrating or Picketing in a Capitol Building in violation of 40 U.S.C. § 5104 (e)(2)(G). A status hearing is currently set for 13 July 2023.
2. Both counsel for the government and undersigned counsel have trial matters set the same day as the currently scheduled status date here. Additionally, at the time of writing, counsel and Mr Zoyganeles remain in discussions as to the status of Mr Zoyganeles' request to withdraw his guilty plea. The additional time sought by the parties has the potential to facilitate a resolution of this outstanding issue.
3. Following discussions between the parties, a 30-day period is envisaged to potentially resolve the outstanding issues here and be in a position to move forward. Should the Court have availability, the parties are requesting a new date either 2nd, 3rd, or 4th August, 2023.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Joint Motion to Continue Status Hearing in the above-captioned proceeding.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Joint Motion to Continue Status Hearing is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 30th day of June, 2023.

/s/ Peter A. Cooper

Peter A. Cooper