UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	**CASE NO. 21-cr-537-JMC**
v.	:	
	:	
RYAN SAMSEL, et al.,	:	
	:	
Defendants.	:	

MOTION FOR EXTENSION OF TIME
TO FILE JOINT STATUS REPORT

The United States of America respectfully moves this Court for an extension of time from September 7, 2022 until September 14, 2022 to file a joint status report for the reasons stated below:

1. On August 5, 2022, this Court issued an order requiring the parties to:

> file a Joint Status Report by September 7, 2022, apprising the Court of the status of the case. The Court asks the Parties to include in that report any updates on the issues previewed at the last conference on July 7, 2022, as well as the Parties respective positions on them: any schedule for the disclosure of experts pursuant to Federal Rule of Criminal Procedure 16; any deadline for any Federal Rule of Evidence 404(b) notice provided by the Government; and whether there is any need for a written jury questionnaire in this case. Finally, the Court instructs the Parties to include in that report at least three dates and times in late September or early October when all Parties are available for a rescheduled status conference.

See August 5, 2022 Minute Entry.

2. On August 17, 2022, Assistant Federal Public Defender Lauren Rosen filed a notice of appearance on behalf of defendant Paul Russsell Johnson, whose prior counsel had withdrawn from the above-captioned case. *See* ECF 190. From approximately July 8, 2022 (*see* Minute Entry of that date) until August 17, 2022, it appears that defendant Johnson was unrepresented.

3. On September 1, 2022, the prosecution contacted defense counsel by electronic mail seeking input for the joint status report, or alternatively, suggesting the option of a conference

call.

4. On September 2, 2022, the prosecution sent an additional electronic mail message noting that no responses had been received to the September 1 message and seeking counsel's position on an extension of time until September 14 to file the joint status report, in light of the upcoming federal holiday on September 5, 2022.

5. As of this writing, the prosecution has heard from Stanley Woodward, Esq., counsel for defendant Ryan Samsel, who advises that he has no objection to the requested extension, and from Assistant Federal Public Defender Rosen, counsel for defendant Johnson, who also advises that she has no objection. Additionally, Angela Halim, Esq., counsel for defendant Stephen Chase Randolph, has responded that an extension "is a good idea" and a conference among counsel "is in order" before submission of the joint status report.

WHEREFORE, the United States respectfully requests an extension of time until September 14, 2022 for filing a joint status report. The extension will allow counsel for the parties to agree on a time to confer and prepare the joint report.

Respectfully submitted,

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