

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

**UNITED STATES OF AMERICA** :  
 : **CRIMINAL NO. 21-cr-00054 (TSC)**  
 v. :  
 :  
**MATTHEW MAZZOCCO,** :  
 :  
 **Defendant.** :

**JOINT MOTION TO CONTINUE AND  
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney the Acting United States Attorney for the District of Columbia, and the defendant, by and through his attorney Robbie Ward, hereby move this Court to vacate the status conference presently scheduled for June 21, 2021, to continue the matter for approximately one week, and further to exclude the time within which 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). The parties submit that they have reached a resolution this matter and are finalizing the necessary paperwork. In addition, at the last status hearing on this matter, the Court advised the parties that it would need the finalized paperwork at least one week in advance of the plea hearing. Accordingly, the parties are seeking a plea hearing during the week of June 28, 2021, and will provide the Court with the finalized paperwork no later than close of business on Friday, June 18, 2021.

The parties submit that under these circumstances, the ends of justice to be served by a one week continuance outweigh the interests of the public and the defendant in a speedy trial, and the Court should consequently exclude time under the Speedy Trial Act for the above stated reasons.

Undersigned counsel has provided a copy of this motion to Robbie Ward, Esq., counsel for the defendant, and Ms. Ward informed the undersigned that this may be filed as a joint motion. The parties respectfully request a date in the week of June 28, 2021.

WHEREFORE, the parties respectfully requests that this Court grant the motion for an approximately one week continuance of the above-captioned proceeding, and that the Court 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).

Respectfully submitted,

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