

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

|                                     |   |                                |
|-------------------------------------|---|--------------------------------|
| <b>UNITED STATES OF AMERICA</b>     | : |                                |
|                                     | : |                                |
|                                     | : |                                |
| v.                                  | : | <b>Case No. 21-cr-26 (CRC)</b> |
|                                     | : |                                |
| <b>CHRISTOPHER MICHAEL ALBERTS,</b> | : |                                |
|                                     | : |                                |
| <b>Defendant.</b>                   | : |                                |

**JOINT STATUS REPORT AND MOTION TO CONTINUE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Allen Orenberg, counsel for the defendant, Christopher Michael Alberts, hereby submit the following Joint Status Report and continuance request:

Pursuant to the Court’s guidance at the last status hearing on September 21, 2021, the parties conferred and submit the following:

1. On September 8, 2021 Mr. Allen Orenberg, Esq., was appointed by the court to replace Mr. John Kiyonaga and represent the defendant.
2. A status hearing was conducted on September 21, 2021, at which the parties jointly requested a further status date to allow the government time to continue providing discovery, the defendant time to consider the outstanding plea offer, and Mr. Orenberg time to familiarize himself with the case.
3. To date the government has provided voluminous discovery to the defendant, however that process is ongoing. Moreover, the defense is still in the process of reviewing recently received discovery.
4. As a result of the above representations, the parties are jointly requesting the Court continue the currently scheduled status hearing for a period of 60-90 days.

5. Moreover, the parties jointly recommend the following dates for a continued status hearing in this case: January 25, January 27, and February 8, 2022. If these dates are not available with the Court the parties will confer and submit additional dates as necessary.
6. For the reasons outlined in the Court's November 1, 2021 Order, the parties further believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to produce discovery, the defense continues to review discovery, and the parties work through plea negotiations. Therefore, the parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv). Therefore, the parties request an exclusion of time under the Speedy Trial Act from November 10, 2021, through the next scheduled status date.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney

By: \_\_\_\_\_ /s/

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\_\_\_\_\_ /s/

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