

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 15-cr-30018-MGM
ALEXANDER CICCOLO,)	
a/k/a Ali Al Amriki,)	
)	
Defendant.)	

MOTION TO CONTINUE STATUS CONFERENCE

The United States of America, by and through Carmen M. Ortiz, United States Attorney for the District of Massachusetts, moves, with the assent of counsel for the defendant, David Hoose, Esq., to continue the Interim Status Conference scheduled for March 23, 2016 for sixty days. In support of its motion, the government states:

1. The government has been reviewing the evidence against the defendant and potential additional charges which may be brought against him. The government has not made a final decision, but anticipates that it will be able to make the decision whether to bring such charges and which charges to bring within sixty days.

2. The government’s approval process for potential superseding charges requires multiple levels of review both locally in the United States Attorney’s Office in Massachusetts and at additional levels within the Department of Justice.

3. The government has produced over 1,000 pages of discovery, including disks of hard drive images from three computers, which all parties must review.

4. The Court ordered that the defendant is not required to serve discovery requests until the government makes a decision regarding superseding charges.

5. Nonetheless, even in the absence of formal discovery requests, the government is continuing to make supplemental discovery productions to the defendant, which the defendant

must review and discuss with his counsel. As a result, during this intervening time the parties are still making progress in moving this case through the pretrial process.

6. Counsel for the defendant assents to this motion and to excluding the sixty days from the time within which the case must be tried under the Speedy Trial Act. The government will submit a separate motion for an order of excludable delay.

Respectfully submitted,
CARMEN M. ORTIZ
UNITED STATES ATTORNEY

By: /s/ Deepika B. Shukla
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CERTIFICATE OF SERVICE

March 18, 2016

I hereby certify that the foregoing was filed by ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Deepika Bains Shukla
Deepika Bains Shukla
Assistant U.S. Attorney