

## **U.S. Department of Justice**

United States Attorney District of New Jersey

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January 29, 2020

The Honorable Claire C. Cecchi United States District Judge Martin Luther King Jr. Federal Building and U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

> Re: United States v. Matthew Brent Goettsche, et al., Crim. No. 19-877

Your Honor:

The United States of America, through the undersigned, respectfully submits this letter to the Court to: (1) provide the Court with an update regarding the parties' efforts to meet and confer about discovery and a scheduling order in this case; and (2) respectfully request that the Court permit the parties to have until February 14, 2020 to continue discussing the possibility of an agreed upon scheduling order or, if no agreement can be reached, to submit competing proposed scheduling orders along with justifications.

On January 28, 2020, counsel for the Government met with counsel for defendants Matthew Brent Goettsche, Jobadiah Sinclair Weeks, and Joseph Frank Abel to discuss discovery and a reasonable scheduling order in this case, as contemplated by paragraphs 2 through 6 of the Court's Standing Order for Criminal Trial Scheduling and Discovery and Federal Rule of Criminal Procedure 16.1. While the conversation was productive, the parties were not able to agree upon a schedule by the conclusion of that meeting.

Counsel for the Government has conferred with counsel for defendants Goettsche, Weeks, and Abel, who agree that additional time may result in the parties' reaching consensus on a discovery scheduling order. Accordingly, the Government respectfully requests that the Court permit the parties until February 14, 2020, to submit either a joint proposed scheduling order or competing proposed scheduling orders with justifications.

Respectfully submitted,

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