

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,	:	
	:	Crim. No. 24-267 (KMW)
Plaintiff,	:	
	:	
vs.	:	
	:	
ADRIENNE PONZO, et al.	:	CONSENT MOTION FOR
	:	MODIFICATION OF
	:	PRE TRIAL MOTION SCHEDULE
Defendant.	:	

Application is hereby made for an Order extending time within which Defendant Adrienne Ponzo may file Pretrial Motions and extending dates requiring subsequent responses, replies, oral argument, and final pretrial conference by two months and it is represented that:

1. One previous extension has been obtained;
2. The current time to file pretrial motions expires on September 13, 2024;

3. Undersigned counsel for Adrienne Ponzo and Mark Catanzaro, Esq. for James Wessels are currently waiting budget approval from the Third Circuit for ancillary services from Cornerstone Legal Consultants to host the large volume of discovery turned over by the Government and to put it in an organized and searchable format on their legal trial cloud based service Junto. This program has been used by CJA counsel before in other complex and large volume discovery cases and will decrease counsel's time in searching, organizing and digitizing discovery for motion practice and for trial. To date we do not have the program as Counsel and Cornerstone is awaiting budget approval. Counsel needs the program to effectively review discovery for pre-trial motion practice.

4. Defense Counsel for co-defendants James Wessels – Mark Catanzaro, Esq. and Eric Rivera – Philip L. Reizenstein, Esq. – have indicated they wish to join this Application for Extension of Time for Deadlines in Scheduling Order (DE 41) by two months; and

5. Counsel for the United States, AUSA Daniel Friedman, has indicated he has no objection to this application

6. Wherefore it is respectfully requested that the Court grant the within request for addition time to file motions, responses and a hearing for oral argument on said motions if necessary.

Dated: September 6, 2024

/s/ Troy A. Archie

TROY A. ARCHIE, ESQUIRE