UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v. Docket No. 24-cr-10233-MJJ

KATHERINE REYNOLDS,
Defendant

ASSENTED TO MOTION TO CONTINUE TRIAL

The defendant respectfully moves this Honorable Court to continue the trial in this case from December 1, 2025 to any date thereafter convenient with the Court and the parties that is after the resumption of the federal funding crisis, and to exclude the time from to the date of the hearing from the calculations of the Speedy Trial Act.

As grounds for this motion, the defendant states:

1. The Federal Government funding expired at midnight on September 30, 2025.
2. Federal funding for CJA panel has ceased in mid-July.
3. CJA counsel has not received payment for this or any federal case since prior to July.
4. The defendant in the case at bar is not only indigent but is homeless and is currently residing in a homeless shelter.
5. The defendant has no funds nor does the CJA appointed counsel have funds to provide transportation for meeting, court appearance or provide appropriate court clothing for the defendant.
6. CJA is without funds to pay for use of an investigator, funds for printing, or other support needed for trial.
7. The US Supreme Court on March 18, 1963 issued its decision in Gideon v. Wainwright, 372 US 335 (1963) which guarantees the Sixth Amendment right to guarantee counsel.

8. In 1964 Congress enacted the Criminal Justice Act, 18 USC sec. 3006A (CJA) to "promote the cause of criminal justice by providing for the representation of defendants who are financially unable to obtain an adequate defense in criminal cases in the court of the United States." Pub.L. 88-455, 78 Stat. 552.1
9. Beyond furnishing counsel, the CJA specifies that "[r]epresentation shall include counsel and investigative, expert, and other services necessary for adequate representation." 18 U.S.C. § 3006A(a). *See,* United States v. Adams, 2025 U.S. Dist. LEXIS 187847, at *17 (D.D.C. Sep. 24, 2025).
10. The lack of funding for counsel and resources, the defendant submits, affects the defendant's right to obtain an adequate defense as guaranteed by the Criminal Justice Act.
11. In the case at bar, the defendant is not in custody.
12. The AUSA assents to this continuance.

Respectfully submitted,
Katherine Reynolds
By her attorney,

/s/ Joan M. Fund
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joan M. Fund
Joan M. Fund, Esquire

Date: November 3, 2025