

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 2:22-CR-86
	)	
CHARLES HUNTER HOBSON	)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION TO CONTINUE**

The United States of America, by and through undersigned counsel, respectfully responds to Defendant Charles Hunter Hobson’s Motion to Continue Trial Date and All Pretrial Deadlines (ECF No. 96). This case is under prioritized review pursuant to the President’s February 10, 2025, Executive Order (the “Executive Order”), and the United States expects to have an update on the status of its review no later than March 18, 2025. Trial has been set by this Court’s June 17, 2024, Pretrial Order (the “Pretrial Order”) (ECF No. 74) and is currently scheduled to last four weeks, but after review of evidence and diligent preparation, the United States respectfully submits that it expects to complete trial in two weeks or less. Accordingly, the United States requests that the Court hold Defendant’s motion in abeyance and issue the attached proposed order resetting the first day of trial to May 5, 2025, extending all other deadlines in the parties’ agreed-upon Pretrial Order (ECF No. 74) by two weeks, and directing the United States to provide a status report regarding its review on or before March 18, 2025.

This case was indicted nearly three years ago, on March 29, 2022, by a duly sworn grand jury in the Western District of Pennsylvania (ECF No. 3). Since that time, Defendant has sought at least fifteen continuances of pre-trial deadlines and the trial date itself, including his most recent motion. *See* ECF Nos. 19, 28, 32, 34, 45, 47, 51, 54, 59, 62, 66, 69, 72, 75, 96. Trial is currently set for April 21, 2025.

On February 20, 2025, Defendant moved for a six-month continuance based exclusively on the Executive Order and the provision of additional time for the Government to review this case (ECF No. 96). The Government's review of this case pursuant to the Executive Order is underway and, with the trial date approaching, this review has been prioritized. The Government requests additional time to update the Court regarding that review. To that end, and given the revised estimate of trial length, we therefore respectfully request that the Court (i) direct the United States to submit a status report on or before March 18, 2025, (ii) extend all deadlines in the parties' agreed-upon Pretrial Order (ECF No. 74) by two weeks, with trial to begin on May 5, 2025—still within the currently scheduled trial period—and (iii) otherwise hold Defendant's instant Motion in abeyance.

A proposed order is attached.

Respectfully submitted,

GLENN S. LEON  
CHIEF, CRIMINAL DIVISION  
FRAUD SECTION

TROY RIVETTI  
ACTING UNITED STATES ATTORNEY

*s/ William E. Schurmann*

William E. Schurmann  
Assistant Chief  
Natalie R. Kanerva  
Ligia Markman  
Trial Attorneys

*s/ Nicole A. Stockey*

Nicole A. Stockey  
Assistant United States Attorney  
PA ID No. 306955

U.S. Department of Justice  
Criminal Division, Fraud Section  
1400 New York Avenue, NW  
Washington, DC 20005

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically on March 4, 2025, with the Clerk of Court by using the CMF/ECF system, which will send notice of electronic filing to all counsel of record.

s/ Natalie R. Kanerva  
Natalie R. Kanerva