

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA

vs.

CRIMINAL NO. 1:21-CR-733(CRC)

JEREMY BAUCHE

June 15, 2022

DEFENDANT'S MOTION TO CONTINUE STATUS CONFERENCE

Counsel for the defendant in the above-caption matter respectfully moves to continue the June 21, 2021 status conference in this matter. The government consents to the granting of this motion. The basis for this motion is a scheduling conflict.

Counsel for the defendant has a longstanding personal commitment with his spouse on June 21, 2022 that cannot be easily rescheduled. Accordingly, counsel is not available on June 21.

Additionally, a continuance would assist the parties in finalizing the contemplated agreement. As noted at the last status conference, Mr. Baouche wishes plead to guilty but there was one outstanding issue the precluded entry of a plea agreement. The parties have made substantial progress on this issue but are still waiting on approval from the government on a final plea agreement.

Undersigned counsel has conferred with government counsel and the following dates would be mutually agreeable for a Zoom hearing:

June 28, 2022 in the morning (prior to 2:30);

June 29, 2022 in the afternoon (after 1:30);

July 1, anytime other than 12 to 1;

July 6, 2022, anytime after 11 am;

July 7, 2022 in the morning.

WHEREFORE, counsel for the defendant respectfully requests that the status conference be continued as set forth in the motion.

Respectfully Submitted,

THE DEFENDANT
JEREMY BAUCHE

/s/Daniel M. Erwin/s/
By Daniel M. Erwin (ct28947)
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CERTIFICATION OF SERVICE

This is to certify that on June 15, 2022, a copy of the forgoing was filed electronically via the Court's CM/ECF system, and by that system, counsel for the Government has been provided with a copy of the forgoing.

/s/Daniel M. Erwin/s/
Daniel M. Erwin