

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

-v-

STEPHANIE MARYLOU BAEZ,

Defendant.

Criminal No. 21-cr-507 (PLF)

DEFENDANT'S MOTION TO CONTINUE
(SURGERY)

COMES NOW, Stephanie Marylou Baez ("Baez"), by and through counsel, with this motion to continue trial date due to unexpected surgery and related medical issues. As grounds therefore, defendant states that she went in for a medical appointment on September 6 and was informed she needed emergency surgery on Friday, September 9.

Ms. Baez has been told she must go through ultrasound testing in the near future with likely additional surgeries in early to mid November. Scheduling is contingent on doctors' schedules but should be in the November range, with recovery afterward.

These medical procedures were unknown and unpredicted at the time trial was scheduled at the recent status hearing.

Ms. Baez cannot stand trial on November 29th as scheduled. We seek a continuance so that trial may be scheduled after the first of the year, with corresponding continuance of motion schedules.

The United States does not oppose.

Dated: September 28, 2022

Respectfully submitted,

/s/ John M. Pierce

John M. Pierce

John Pierce Law, P.C.

21550 Oxnard Street

3d Floor, PMB 172

Woodland Hills, CA 91367

Tel: (213) 279-7846

jpierce@johnpiercelaw.com

Attorneys for Defendant

Stephanie Marylou Baez

CERTIFICATE OF SERVICE

I hereby certify that, on September 28, 2022, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce
John M. Pierce