## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
V.	)
	) Case Number: 1:22-cr-00261-CRC
TRUDY CASTLE	)
	) Hon. Judge Christopher R. Cooper
and	)
	)
KIMBERLY DIFRANCESCO	)
	)
Defendants.	)
	_)

## **DEFENDANT'S MOTION TO CONTINUE**

The Defendants, Trudy Castle and Kimberly DiFrancesco, through their Attorney, Michael P. Gillespie, moves this Honorable Court to continue the August 10<sup>th</sup>, 2022, plea agreement hearing to August 17<sup>th</sup>, 2022, at 11:00 AM.

- The Defendants are charged in the above-captioned matter with violating 18 U.S.C. § 1752(a)(1); 18 U.S.C. § 1752(a)(2); 40 U.S.C. § 5104(e)(2)(D); and 40 U.S.C. § 5104(e)(2)(G).
- On August 1<sup>st</sup>, 2022, this Honorable Court set the above-captioned cause for plea hearing on August 10<sup>th</sup>, 2022, at 10:00 AM by video conference.
- 3. Defense Counsel is set for a motion hearing in the Circuit Court of Cook County, IL on August 10<sup>th</sup>, 2022, before the Honorable Judge William H. Hooks and did not initially realize the conflict when the plea hearing date was set in this matter.
- 4. Defense Counsel apologizes for any inconvenience to this Honorable Court.

- Defendants ask this Honorable Court to continue the plea hearing date to August 17<sup>th</sup>,
   2022, at 11:00 AM by videoconference.
- Defense Counsel has spoken with Assistant United States Attorney Emily W. Allen who
  indicated the Government would not object to continuing the plea hearing to August 17<sup>th</sup>,
  2022, at 11:00 AM.

WHEREFORE, Defendant requests that this Honorable Court grant Defendant's Motion to Continue and continue the plea hearing to August 17<sup>th</sup>, 2022, at 11:00 AM.

Sincerely,

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Michael P. Gillespie

Attorney at Law
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of August 2022, I electronically filed the foregoing **Motion to Continue** with the Clerk of Court using the CM/ECF system which will send notification of such filing to all listed parties.

Attorney Michael P. Gillespie

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