

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA, :
 :
 v. : **Case No. 1:21-cr-0091-RCL-01**
 :
CRAIG MICHAEL BINGERT, et al. :
Defendant. :

**MOTION TO REQUEST THE COURT
TO SCHEDULE A STATUS HEARING**

COMES NOW Defendant, Craig Michael Bingert, by and through undersigned counsel, and respectfully moves this Honorable Court to schedule a status hearing on a date and time convenient to the Court and to the parties. As grounds, the following is stated:

1. This motion is joined by counsel for defendant Isaac S. Sturgeon and the government does not oppose this motion. On February 13, 2023, undersigned counsel sent an e-mail to defendant Taylor J. Johnatakis, requesting his position on this motion. On February 15, 2023, Mr. Johnatakis replied via e-mail, stating, “All, Please communicate with by mail only. Look for my reply by mail shortly.”

2. Trial of this matter is scheduled for May 15, 2023. The Court has not yet scheduled a pre-trial conference, or any other hearing dates. Furthermore, the Court has not issued a Scheduling Order in anticipation of trial.

3. At this time the following pre-trial motions are pending:

- Motion to Sever Defendant by Isaac Steve Sturgeon. (Doc. 79)
- Motion to Change Venue by Isaac Steve Sturgeon. (Doc. 82)

- Motion to Compel Discovery by Isaac Steve Sturgeon. (Doc. 83)
- Motion for Joinder of Co-defendant Sturgeon's Motions Nos. 82 & 83 by Craig Michael Bingert. (Doc. 86)
- Motion to Dismiss Count 4, 5, 6, 7, & 8 as Multiplicitous by Craig Michael Bingert. (Doc. 87)
- Motion for Joinder to Join Defendant Issac Steve Sturgeon's Motion for Severance (Dkt. 79) by Craig Michael Bingert. (Doc. 89)
- Motion for Joinder by Isaac Steve Sturgeon. (Doc. 90)
- Motion to Sever Defendant Pursuant to Fed. R. Crim. P 14(a) by Craig Michael Bingert. (Doc. 110)

In addition, defendants Bingert and Sturgeon have each filed a Notice of Public Authority Defense. (Docs. 84 & 88).

WHEREFORE for the foregoing reasons and such other reasons that may appear just and proper, the parties are requesting the Court to schedule a status hearing, on a date and time convenient to the Court and to the parties.

Respectfully Submitted,

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Counsel for Mr. Craig Michael Bingert

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February, 2023, copies of the foregoing Motion to Request the Court to Schedule a Status Hearing, and a proposed Order, were served to case registered parties by CM/ECF, and by mail to:

Taylor James Johnatakis
29628 Gamble Place NE
Kingston, Washington 98346-9560

Allen H. Orenberg, # 395519