

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

UNITED STATES OF AMERICA

v.

PETER J. SCHWARTZ,

Defendant.

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Case No. 21-CR-178 (APM)

**DEFENDANT PETER SCHWARTZ’S UNOPPOSED MOTION FOR CONTINUANCE
OF MOTIONS HEARING**

Defendant Peter J. Schwartz (“Mr. Schwartz”), by and through undersigned counsel, respectfully moves the Court to continue the Motions Hearing which is currently scheduled for September 16, 2022. In support of his motion, Mr. Schwartz states as follows:

1. A hearing on motions pursuant to Federal Rule of Criminal Procedure 12(b)(3)(A)–(D) is currently scheduled for September 16, 2022, at 1:00 p.m. [ECF 89].
2. Unfortunately, the Motions Hearing conflicts with long-scheduled international travel on the part of undersigned counsel for Mr. Schwartz, Dennis E. Boyle, Esquire, who will be presenting arguments on Mr. Schwartz’s behalf.
3. Undersigned counsel has conferred with counsel for the Government, Assistant United States Attorney Jocelyn Bond, who does not object to the relief sought herein provided that the deadlines for Rule 12 pretrial motions/responses/replies be amended as follows: August 30 (motions), September 13 (responses), and September 20 (replies).
4. Undersigned counsel has also conferred with counsel for Defendant Jeffrey Scott Brown, Sam C. Moore, Esquire, and counsel for Defendant Markus Maly, Benjamin

Schiffelbein, Esquire, who do not object to the relief sought herein and agree to an extension of the deadlines for the Rule 12 pretrial motions/responses/replies.

5. The Parties can be available to participate in the Motions Hearing on September 28, 29, or 30, 2022.

WHEREFORE, based upon the foregoing, Defendant Peter J. Schwartz respectfully requests that this Honorable Court will grant his motion and continue the Motions Hearing to a later date when the undersigned will be available to attend, as well as extend the deadlines for the Rule 12 pretrial motions/responses/replies. There are no other pending deadlines or court dates that this request for a continuance would affect.

Respectfully submitted,

/s/ Dennis E. Boyle
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Counsel for Defendant Peter J. Schwartz

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August 2022, I electronically filed the foregoing Motion and Proposed Order with the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Dennis E. Boyle

Dennis E. Boyle