

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. :

**CONSENT MOTION TO CONTINUE STATUS HEARING AND
HEARING ON DEFENDANT BINGERT'S MOTION FOR
SEVERANCE, [110] SCHEDULED FOR MARCH 9, 2023**

COMES NOW CRAIG MICHAEL BINGERT, by and through counsel, and hereby requests the entry of an order continuing the status hearing and a hearing on defendant Bingert's motion for severance [110], scheduled for March 9, 2023, at 11:30 a.m., to a date convenient to the Court and to the parties. As grounds, the following submitted:

1. This motion is consented to per AUSA Kaitlin Klamann and AFPD Maria Jacob.¹ The position of *pro se* co-defendant Taylor James Johnatakis is unknown.
2. On March 3, 2023, the Court issued a Minute Order scheduling a status hearing and a hearing on defendant Bingert's motion for severance [110] for March 9, 2023 at 11:30 a.m. (VTC) A jury trial is scheduled for May 15, 2023.

¹ Counsel is transmitting this motion (and a proposed order) by e-mail to attorney Chris Black, stand-by counsel for *pro se* co-defendant Taylor James Johnatakis.

3. On March 6, 2023, undersigned counsel is starting a 5-8 day bench trial before U.S. District Judge Carl J. Nichols. (21-447-CJN) Consequently, does not expect to be available to this Court on March 9, 2023, at 11:30 a.m.

4. The following dates/times are suggested:

March 16, 2023 (afternoon) or March 20, 2023 (after 3:30 p.m.).

(Please note undersigned counsel will be out of town and unavailable March 22, 2023 through March 27, 2023.)

If these proposed dates are not good for the Court, then the parties respectfully ask that the Courtroom Clerk contact counsel to discuss good dates/times.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, the parties request the entry of an order continuing the status hearing and a hearing on defendant Bingert's motion for severance [110], scheduled for March 9, 2023, at 11:30 a.m., to a date convenient to the Court and to the parties.

Respectfully Submitted,

Allen H. Orenberg, # 395519
The Orenberg Law Firm, P.C.
12505 Park Potomac Avenue, 6th Floor
Potomac, Maryland 20854
Tel. No. 301-984-8005
Cell Phone No. 301-807-3847
Fax No. 301-984-8008
aorenberg@orenberglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2023, copies of the foregoing Motion to Continue Status Hearing and Hearing on Defendant Bingert's Motion for Severance, [110] Scheduled for March 9, 2023, 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