

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	21-MJ-84 (ZMF)
- against -)	
)	
NICOLAS ANTHONY MONCADA,)	
)	
Defendant.)	

MOTION TO CONTINUE PRELIMINARY HEARING

Mario F. Gallucci, counsel for defendant Moncada submits this Motion to Continue Preliminary Hearing in the above captioned matter currently scheduled for Monday, October 4, 2021. Defense counsel is seeking a continuance of the preliminary hearing. Defense counsel is presently engaged in the murder trial of People vs. Michael Cammarata (Indictment #183/2019) in the Supreme Court of the State of New York, Richmond County, in front of The Honorable Justice Mario Mattei. The trial is expected to last until the second week of November. Defense counsel is requesting a 60-day continuance of this matter. AUSA Cole is unopposed to the continuance. Please note that defense counsel is unavailable the week of December 6, 2021.

The defendant waives and agrees that the Speedy Trial Clock is tolled from October 4, 2021 until the next court date.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify on the 30th day of September, 2021 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of the Court.

/s/

Mario F. Gallucci, Esq.