UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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

JOINT MOTION TO CONTINUE PRELIMINARY HEARING

Mario F. Gallucci, counsel for defendant Moncada and The United States of America by its Assistant United States Attorney Emory V. Cole submit this Joint Motion to Continue Preliminary Hearing in the above captioned matter currently scheduled for Thursday, September 1, 2022. The parties are seeking a continuance of the preliminary hearing. We have a plea agreement, however, defendant's counsel has had a personal tragedy and has been away from the office and needs more time to discuss with defendant. The parties are requesting a 30-day continuance of this matter.

The defendant waives and agrees that the Speedy Trial Clock is tolled from September 1, 2022 until the next date in the matter.

Respectfully submitted,

/s/

Mario F. Gallucci, Esq. NYS Bar #2421287 The Gallucci Law Firm 1110 South Avenue, Suite 29 Staten Island, NY 10314 Telephone: (347) 273-1269

Email: <u>mario@galluccilawfirm.com</u>

mfg7102@aol.com

CERTIFICATE OF SERVICE

I hereby certify on the 30th day of August, 2022 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.	