## UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA WASHINGTON, DC

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 1:21-C00060-CKK
	§	
JESUS D. RIVERA	§	

## DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

## TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant, through Counsel, and requests a continuance of the deadlines and trial in this case.

Yesterday, This Honorable Court issued a scheduling order in the instant case, with deadlines for motions commencing December 28, 2021 and trial commencing March 14, 2022.

However, the parties are still conducting discovery in this case. The Government has recently provided "Global Discovery 9" and may be producing more such discovery over the foreseeable future. The discovery already provided is voluminous and Defendant and Defense Counsel are going through it, diligently, but slowly.

Additionally, Defense Counsel has a murder trial in Georgia starting on February 28, 2022, that is expected to take three weeks, ending around March 18, 2022. [U.S. v. Jonathan Lauture.]

Further, Defense Counsel has numerous other settings in Federal, State, and military courts scheduled for trial or other resolution between now and the middle of May, 2022.

Therefore, Defense Counsel very respectfully requests that the deadlines in this case be continued approximately 2 and one-half months, with trial to commence the first week of June, 2022.

Defense Counsel has discussed this motion with Assistant U.S. Attorney John Borchert, who is unopposed to our request.

WHEREFORE, premises considered, the Defendant very respectfully requests that This Honorable Court grant this unopposed motion for continuance.

Very respectfully,

/S/ Guy L. Womack

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## CERTIFICATE OF SERVICE

A copy of the foregoing was delivered via CM/ECF to the U. S. Attorney's Office on this 22<sup>nd</sup> day of December, 2021.

/S/ Guy L. Womack Guy L. Womack