

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	
<b>v.</b>	)	<b>Case No. 21-cr-00507 (PLF)</b>
	)	
<b>STEPHANIE BAEZ</b>	)	
	)	
<b>Defendant</b>	)	
	)	

**MOTION TO VACATE TRIAL DATE AND CONTINUE TRIAL**

Defendant, Stephanie Baez by and through her counsel of record, John M. Pierce., files this Motion to Continue Vacate Trial Date and Continue Trial in this matter, currently set to begin November 29, 2022.

On September 29, 2022, Defendant Baez filed a motion with this Court to continue her trial date due to the need for a medical procedure that was unknown to her or counsel at the time counsel and this Court set the November 29, 2022, trial date. Defendant Baez incorporates that motion by reference. *See* EFC. No. 33.

Defense Counsel Pierce has discussed this issue with Assistant United States Attorney who indicated that the Government has no opposition to resetting the trial for Defendant Baez due to Defendant Baez’s need for surgery. Both parties are agreeable to excluding time under the Speedy Trial Act to and through the rescheduled trial date due to the unavailability of Defendant Baez, and to maintain continuity of counsel on his behalf.

Counsel’s staff reached out to the government this morning but was unable to confer this morning, Oct. 3, 2022. (We will continue to seek to confer.) Defendant Baez would request the

trial set for November 29, 2022 be vacated and tentatively reset for April 3<sup>rd</sup> 2023, pending on the government's schedule and availability.

Dated: October 3, 2022

Respectfully Submitted,

John M. Pierce  
21550 Oxnard Street  
3<sup>rd</sup> Floor, PMB #172  
Woodland Hills, CA 91367  
Tel: (213) 400-0725  
Email: [jpierce@johnpiercelaw.com](mailto:jpierce@johnpiercelaw.com)  
*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I, John M. Pierce, hereby certify that on this day, October 3, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce  
John M. Pierce