

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>Case No. 21-cr-00407-DLF-02</b>
	:	
<b>DANIEL JOHNSON,</b>	:	
<b>Defendant.</b>	:	

**MOTION TO CONTINUE PRELIMINARY REVOCATION  
HEARING SCHEDULED FOR MAY 13, 2024**

COMES NOW, Defendant Daniel Johnson, by and through his counsel Allen H. Orenberg and, and hereby respectfully requests the entry of an Order continuing the preliminary revocation hearing from May 13, 2024, to a date in late June, 2024, or to any other date convenient to the Court and to the parties. As grounds, the following is stated:

1. A U.S. Probation Office Petition (ECF No. 86 – sealed) was filed on February 9, 2024. Consequently, Daniel Johnson was arrested, in Cedar Rapids, Iowa, on February 23, 2024. A preliminary revocation hearing is scheduled for May 13, 2024 at 9:00 a.m. (VTC)

2. Violation No. 1 of the (sealed) U.S. Probation Office Petition alleges “On or about February 1, 2024, in the Northern District of Iowa, Mr. Johnson was charged and arrested for domestic abuse assault and interference with official acts, case number SRCR026981 . . .”

3. The trial of the above noted case is now scheduled for June 5, 2024, in Osage, Iowa. *See* Order Rescheduling Pretrial Conference and Trial, dated 4/16/2024. (Attached as an exhibit) Mr. Johnson intends “go to trial” in Iowa on June 5, 2024.

4. Mr. Johnson is requesting this Court to continue the May 13, 2024, preliminary revocation hearing until after the Iowa trial. Doing so is in the best interests of Mr. Johnson and should not affect the orderly administration of this court’s business.

5. The government opposes this Motion for Modification of Conditions of Release, per AUSA Jake Struebing.

6. If the Court grants this motion, it is respectfully suggested that the Courtroom Deputy Clerk consult with the parties regarding the selection of a new date/time for a preliminary revocation hearing.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, Daniel Johnson respectfully requests the entry of an Order continuing the preliminary revocation hearing from May 13, 2024, to a date in late June, 2024, or to any other date convenient to the Court and to the parties.

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Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of April, 2022, a copy of the foregoing Motion for to Continue Preliminary Revocation Hearing Scheduled for May 13, 2024, and a proposed Order, was delivered to case registered parties by the CM/ECF court system.

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Allen H. Orenberg