

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CASE NO.: 21-CR-703-RDM

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR CHANG,

Defendant.

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO TRAVEL
TO THE MIDDLE DISTRICT OF FLORIDA
AND MOTION TO CONTINUE THE STATUS REPORT DATE**

Defendant, Julio Cesar Chang, by and through undersigned counsel, hereby files this Unopposed Motion to Travel to the Middle District of Florida and Motion to Continue the Status Report Date, and as grounds in support thereof states as follows:

1. CHANG resides in the Southern District of Florida.
2. CHANG’s doctor, Dr. Craig Lichtblau, M.D. (Double Board-Certified Brain Injury Medicine Specialist and Psychiatrist) has deemed treatment at an in-patient brain and spine program is medically necessary.
3. CHANG has been accepted at the in-patient program at Neulife Neurological Services (hereafter “Neulife”) located at 2725 Robie Avenue, Mount Dora, Florida 32757, in the Middle District of Florida.
4. CHANG’s admission date is tentatively scheduled for Friday, March 24, 2023.
5. Neulife will evaluate CHANG’s progress every 30 days.
6. The treatment is anticipated to last 30 to 60 days but may exceed 60 days depending on CHANG’s recovery process.

7. Undersigned counsel has conferred with CHANG's U.S. Probation Officer in the Southern District of Florida, Bernisa Mejia, who has no objection to this request.
8. Undersigned counsel has also conferred with Assistant United States Attorney Robert Juman who has no objection to this motion.
9. The parties were ordered to file a joint status report on or before April 3, 2023. However, given the extended nature of the in-patient program, the parties request this Honorable Court extend the deadline to file a joint status report from April 3, 2023, to May 24, 2023.
10. The parties further agree that the ends of justice would be served by the exclusion of time under The Speedy Trial Act from today until the next filing is due before this Court.

WHEREFORE, the Defendant, Julio Cesar Chang, respectfully requests this Honorable Court grant him leave to travel to the Middle District of Florida, to attend the in-patient program at Neulife; and that the Court extend the deadline to file a joint status report to May 24, 2023.

Dated: March 17, 2023.

Respectfully submitted,

By: /s/ Joseph S. Rosenbaum
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