

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO BAQUERO,
LOUIS VALENTIN,

Defendants.

Case No. 21-cr-702 (JEB)

MOTION TO CONTINUE

Mr. Julio Baquero and Mr. Louis Valentin currently have a status conference scheduled for June 17, 2022 at 10:30 a.m. Mr. Baquero and Mr. Valentin, through counsel, respectfully requests a continuance until the week of August 22, 2022. The parties have conferred with the Courtroom Deputy and confirmed the Court's availability for this week. The Government has represented that there is no objection to this request.

Counsel for Mr. Valentin has a scheduling conflict and will not be able to appear for the June 17 status hearing. Additionally, the parties continue to review discovery and discuss the matter in order to determine whether there will be a pre-trial resolution.

In light of this request, Mr. Baquero and Mr. Valentin, through counsel, have no objection to exclusion of time under the Speedy Trial Act until the date of the next hearing.

For these reasons, the parties respectfully requests that the Court grant this request for a continuance.

Respectfully submitted,

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/s/

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