

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

v. : Cr. No. 21-738 (BAH)

MICHAEL OLIVERAS : MOTION FOR CONTINUANCE
AND RESCHEDULE
STATUS CONFERENCE DATE

Defendant. :

TO: Anthony L. Franks
Assistant United States Attorney
Eastern District of Missouri (On detail to the District of Columbia)
Thomas F. Eagleton Courthouse
111 South 10th Street, Suite 20.333
Saint Louis, Missouri 63102

COUNSEL:

PLEASE TAKE NOTICE that the defendant, Michael Oliveras, through his attorney, Lori M. Koch, Assistant Federal Public Defender, shall move before the Honorable Beryl A. Howell, Chief United States District Judge for the District of Columbia, at the United States Courthouse, District of Columbia, on a date prior to May 13, 2022 or such other date as may be set by the Court, for an Order rescheduling the current Status Conference date by 10 days until May 25, 2022, for the following reasons, as required by this Court's Standing Order for Criminal Cases:

1. On December 16, 2021, I was appointed to represent defendant Michael Oliveras in this matter. An initial appearance was held on the criminal complaint on December 16, 2021, before the Honorable Zia M. Faruqui, United States Magistrate Judge, via videoconference. A Status Conference was scheduled for January 7, 2022.

2. On January 7, 2022 a Status Hearing was held before Chief Judge Howell via videoconference. On that date, a Status Conference was set for March 11, 2022 to provide additional

time for the production of voluminous discovery. On March 11, 2022, a Status Hearing was held, and a further Status Hearing was set for May 13, 2022 at 9:30 a.m., at which time the parties were to be ready to provide three proposed trial dates and a proposed motions schedule. Time was excluded from that date through May 13, 2022.

3. No previous extensions of time or continuances have been requested or granted in this case. The good cause for this motion is that on May 3, 2022, undersigned counsel was provided the opportunity to attend the (previously filled) National Federal Defender Conference to be held May 10 through May 12, 2022 in Denver, Colorado. Because undersigned counsel resides in Philadelphia, travel to and from Denver will be by air, and requires an additional day. Undersigned counsel is scheduled to return from the conference the morning of Friday, May 13, 2022 – the date and time set for the Status Hearing.

4. Granting this motion for a continuance and reschedule the Status Conference should have minimal effects on the existing deadlines, as those deadlines were to be set on May 13, 2022 (trial date and motions schedule), and will now be set approximately 10 days later, depending on the date the Court assigns if the motion is granted.

5. Having discussed potential alternative dates for the Status Conference, it appears counsel for both parties will be available [**May 23 before 1:00; May 25th anytime, and May 27th anytime**].

6. Counsel for the government has no opposition to this motion for a continuance.

Respectfully submitted,

/s/ Lori M. Koch

Lori M. Koch, Esq.

Assistant Federal Public Defender

DATED: May 5, 2022