

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :  
 :  
 :  
 v. : Case No. 1:22-cr-00011-RJL-02  
 :  
 :  
 DION RAJEWSKI, :  
 Defendant. :

**CONSENT MOTION TO POSTPONE INITIAL STATUS HEARING**

COMES NOW, Allen H. Orenberg, to respectfully request this Honorable Court to enter an Order postponing the initial status hearing scheduled for January 24, 2022, at 3:00 p.m., to a date convenient to the Court and to the parties.

As grounds for this motion counsel would state the following:

1. An initial status hearing is scheduled for January 24, 2022, at 3:00 pm.
2. This motion is consented to by AUSA Nadia Moore and by AFPD Ellis Summers, counsel for co-defendant Zachary Johnson.
3. Mr. Rajewski's older brother has recently passed and the memorial service is scheduled for the afternoon of January 24, 2022. Mr. Rajewski plans to attend the memorial service for his brother and to otherwise be with his family on January 24<sup>th</sup>.
4. To the extent necessary, Defendant Dion Rajewski, by and through counsel, will waive his speedy trial act rights, until such time as the Court conducts a initial status hearing in this matter.

5. Counsel consulted with the Courtroom Deputy Clerk, as well as AUSA Nadia Moore and AFPD Ellis Summers. The following are suggested as “good dates” for an initial status hearing: January 25, 2022, at 4:00 p.m., January 27, 2022 (all day), January 28, 2022. (all day except 11:30 a.m. to 2:00 p.m.) If these suggested date/times are not good for the Court, then it is respectfully requested that the Courtroom Deputy Clerk consult with the parties regarding the selection of a good date/time.

WHEREFORE, counsel for the defendant respectfully requests that this motion be granted and enter an Order postponing the initial status hearing scheduled for January 24, 2022, at 3:00 p.m., to a date convenient to the Court and to the parties.

Respectfully submitted,

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Allen H. Orenberg, Bar #395519  
The Orenberg Law Firm, P.C.  
12505 Park Potomac Avenue, 6<sup>th</sup> Floor  
Potomac, Maryland 20854  
Phone: 301-984-8005  
Fax: 301-984-8008  
E-mail: aorenberg@orenberglaw.com  
Counsel for Dion Rajewski