IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:
v.	: : Case No. 1:22-mj-0237 -MAU-01
	:
RAYMUND CHOLOD,	:
Defendant.	:

CONSENT MOTION FOR CONTINUANCE OF THE MARCH 30, 2023, STATUS HEARING

COMES NOW, Allen H. Orenberg, counsel for Raymund Cholod, and hereby respectfully requests the entry of an Order continuing the status hearing scheduled for March 30, 2023, (1:00 p.m.) to a date convenient to the Court and to the parties. As grounds, the following is stated:

1. This motion is consented to by Assistant U.S. Attorneys Benet Kearney and Zachary Phillips.

2. Discovery production is underway and the parties are engaged in preliminary plea negotiations. However, additional time is needed to finalize plea negotiations and, if successful, for the government to generate the necessary plea documents.

3. It is respectfully suggested the court schedule another status hearing for either June 1, 2023, or June 6, 2023, or to any other date after the parties consult with the Deputy Clerk of Court.

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4. Defendant, Raymund Cholod, by and through counsel, hereby consents to a tolling of the Speedy Trial Act between March 30, 2023, and the next scheduled Court Hearing date.

WHEREFORE, for the foregoing reasons and such other reasons which nay appear just and proper, defendant Raymund Cholod respectfully requests the entry of an Order continuing the status hearing scheduled for March 30, 2023, to a date as suggested herein or to any other date convenient to the Court and to the parties.

Respectfully Submitted,

Allen H. Orenberg, # 395519 The Orenberg Law Firm, P.C. 12505 Park Potomac Avenue, 6th Floor Potomac, Maryland 20854 Tel. No. 301-984-8005 Cell Phone No. 301-807-3847 Fax No. 301-984-8008 aorenberg@orenberglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2023, I served all case registered parties by CM/ECF with a copy of the Consent Motion to Continue the March 30, 2023, status hearing, and a proposed order.

Allen H. Orenberg