## IN THE UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, CASE NUMBER: 1:23-CR-20

Plaintiff, JUDGE TREVOR MCFADDEN

v.

SAUL LLAMAS, <u>MOTION FOR CONTINUANCE OF</u>

: <u>STATUS CONFERENCE</u>

Defendant.

Now comes the Defendant, Saul Llamas, by and through undersigned Counsel, Richard J. Perez, Defendant, Jordan Siemers, by and through undersigned Counsel Charles E. Langmack, II, and Assistant United States Attorney Andrew S. Haag, and jointly requests, for the purposes of keeping Defendant's hearings scheduled on the same date, a continuance of the Status Conference Hearing scheduled for Friday, April 28, 2023 at 10:00 a.m. for 60 days. All parties agree that more time is necessary to review facts and information and to discuss a possible resolution.

Counsel for Defendant, Ryan Swoope, Edward Gerard Bryan, Esq. does not object to this continuance.

This request is made in the interests of justice and not for purposes of delay

Respectfully Submitted,

/s/Andrew Haag

ANDREW S. HAAG (MA 705425)
Assistant United States Attorney
Patrick Henry Building
601 D St., N.W.
Washington, D.C. 20530
(202) 252-7755 Phone
Andrew.Haag@usdoj.gov

RICHARD J. PEREZ (00102/16)

Attorney for Defendant Interstate Square Building I 4230 State Route 306 Willoughby, Ohio 44094

(440) 953-1310

(440) 953-1427 Facsimile

rick@perezlaw.com

CHARLES E. LANGMACK, II (0092470)

Langmack Law

Attorney for Defendant

38106 Third Street

Willoughby, Ohio 44094

(440) 497-5068

(216)245-6155 Facsimile

Langmacklaw@gmail.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2023, a copy of the foregoing was electronically filed with the Clerk of Courts, United States District Court for the District of Columbia, using the CM/ECF system which is to send notification of such filing to the following counsel:

Andrew S. Haag Assistant United States Attorney 400 United States Court House 801 West Superior Avenue Cleveland, OH 44113

> RICHARD J. PEREZ Attorney for Defendant