

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DODGE DALE HELLONEN

No. 1:23-MJ-14-ZMF-3

**UNOPPOSED MOTION TO CONTINUE PRELIMINARY HEARING**

The defendant, Dodge Dale Hellonen, by and through counsel, hereby respectfully moves the Court to continue the preliminary hearing for ninety (90) days to the Court's June 2023 term.

In support of this motion, Mr. Hellonen states the following:

1. Mr. Hellonen was arrested pursuant to a criminal complaint on January 18, 2023. [DE 7].
2. The Office of the Federal Public Defender was appointed to represent Mr. Hellonen on January 26, 2023. The undersigned entered her Notice of Appearance on January 27, 2023. [DE 11].
3. The preliminary hearing is currently set for March 23, 2023, by Telephonic/VTC.
4. Mr. Hellonen is presently on conditions of release and remains in compliance with these conditions.
5. Undersigned counsel needs additional time to meet with Mr. Hellonen, review the discovery, discuss his case, and determine how best to proceed in light of any proposed resolution from the government.
6. Accordingly, undersigned counsel respectfully requests that this Court continue the preliminary hearing for ninety (90) days to the June 2023 term.

7. Assistant United States Attorney Joseph H. Huynh has indicated that he does not oppose this motion.
8. This motion is made in good faith and not for purposes of delay. Neither the government nor the Defendant would be prejudiced by the continuance sought herein.

WHEREFORE, Mr. Hellonen respectfully requests that this Court continue arraignment in this matter for ninety (90) days to the June 2023 term. The ends of justice served by this motion outweigh the interests of the public and the Defendant in a speedy trial as set forth in 18 U.S.C. § 3161(h)(7)(A).

Respectfully requested this 16th day of March, 2023.

G. ALAN DUBOIS  
Federal Public Defender

/s/ Halerie M. Costello  
HALERIE M. COSTELLO  
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Attorney for Defendant  
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N.C. State Bar No. 43030  
LR 57.1 Counsel Appointed

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served upon:

JOSEPH H. HUYNH  
Assistant United States Attorney  
405 East 8th Avenue, Suite 2400  
Eugene, Oregon 97401-2708

by electronically filing the foregoing with the Clerk of Court on March 16, 2023, using the CM/ECF system which will send notification of such filing to the above.

This the 16th day of March, 2023.

/s/ Halerie M. Costello  
HALERIE M. COSTELLO  
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LR 57.1 Counsel, Appointed