

**UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) Case No. 3:18 CR 30172 NJR
vs.)
)
JACE A. FAUGNO,)
)
Defendant.)

MOTION TO CONTINUE PRETRIAL AND TRIAL DATE

COMES NOW Defendant Jace Faugno, by and through his attorney, Mark A. Hammer (“counsel”), and respectfully requests a continuance of the pretrial and jury trial currently scheduled for March 12, 2019 and March 19, 2019. This motion is made on the following grounds:

- 1) The discovery in this case is extensive and Counsel has had inadequate time to fully advise his client regarding its content.
- 2) Counsel has spoken with AUSA Hoell and believes that there is a substantial likelihood that settlement negotiations in this case will prove fruitful. Additional time will be necessary to complete these negotiations.
- 3) The Government has no objection to the proposed continuance.

The defendant agrees to waive his right to a speedy trial, afforded him by the Speedy Trial Act, 18 U.S.C. § 3161, and agrees that the ends of justice served by granting such continuance outweighs the best interest of the public and the defendant in a speedy trial.

For these reasons, defendant respectfully requests the trial date in this matter be continued for approximately sixty days.

Respectfully submitted,

/s/ Mark A. Hammer

Mark A. Hammer, Bar #61542
The Hammer Law Firm, LLC
100 Chesterfield Business Pkwy, Ste 200
Chesterfield, MO 63005
314-651-9311

CERTIFICATE OF SERVICE

I certify that, on March 5, 2019, a copy of this document was electronically filed with the Clerk of Court, and served on all counsel of record, by the CM-ECF system.

/s/ Michelle Deubler