

**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 May 21, 2019 and May 28, 2019. This motion is made on the following grounds:

- 1) 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.
- 2) 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

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Mark A. Hammer, Bar #61542  
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***CERTIFICATE OF SERVICE***

I certify that, on May 13, 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