

**IN THE 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.)	

DEFENDANT’S MOTION TO CONTINUE SENTENCING

COMES NOW Defendant Jace Faugno, by and through his attorney, Mark A. Hammer (“counsel”), and respectfully requests a continuance of his sentencing currently scheduled for July 23, 2020 for about eight weeks. This motion is made on the following grounds:

- 1) Counsel understands that the Court is conducting in-person appearances and is prepared to hear Defendant’s sentencing hearing in-person. Defendant has also recently been notified that he could have his sentencing heard by secure video-teleconferencing. He has considered that option and that is not his preference concerning such an important matter; he would like to appear in person.

- 2) Counsel is 60-years old and has some vulnerability to secondary health issues from COVID-19. Counsel is deeply concerned at this point to appear in the Southern District of Illinois, given the current state of the pandemic, despite the best practices being employed by the Court and attempting to advise his client, who will be traveling from Kentucky to the Southern District for the hearing. If the pandemic conditions remain substantially unchanged in another two months or so, Defendant and counsel will reevaluate the propriety of a video teleconference appearance. For now, Defendant is

respectfully asking that the matter be continued for an in-person appearance at a later date.

- 3) Counsel has spoken to AUSA Christopher Hoell who has *no objection*, and consents to the proposed continuance.

For these reasons, Defendant respectfully requests that his sentencing be continued for about eight weeks.

Respectfully submitted,

/s/ Mark A. Hammer

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CERTIFICATE OF SERVICE

I certify that, on July 21, 2020, 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/ Mark A. Hammer