UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA, v. MAJA NIKOLIC and MARKO NIKOLIC	No. 20 CR 750 Honorable Ronald A. Guzman

JOINT MOTION TO CONTINUE STATUS HEARING

The UNITED STATES OF AMERICA, by its attorney JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, and attorneys MICHAEL GILLESPIE and MICHAEL KREJCI, on behalf of defendant Marko Nikolic, jointly file this motion to continue the August 16, 2022 status hearing, and state as follows:

1. The indictment in this case charges defendant with two counts of wire fraud, in violation of Title 18, United States Code, Section 1343. Dkt. 47. Defendant Marko Nikolic was arraigned and entered a plea of not guilty. Dkt. 59. The co-defendant Maja Nikolic has an outstanding warrant and remains a fugitive.

2. The government has provided defendant Marko Nikolic and counsel discovery materials and continues to produce discovery as materials become available.

3. The counsel for defendant Marko Nikolic and the government continue to diligently discuss and negotiate resolution of the matter against defendant Marko Nikolic. Additionally, the government has made significant progress in its continued investigation.

4. For these reasons, the government and counsel for defendant Marko Nikolic respectfully request that the August 16, 2022 status hearing be reset by 30 days to a date during the week of September 19, 2022.

5. Defendant Marko Nikolic does not object to the exclusion of time under the Speedy Trial Act through the next hearing date, under Title 18, United States Code, Section 3161(h)(7)(A), for continuing plea negotiations, review of discovery and continuity of counsel.

Respectfully submitted,

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