UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, **v.** **JOSE BIAOU,** **Defendant.**	Case No. 1:24-cr-323

MOTION TO CONTINUE TRIAL DATE

Defendant Jose Biaou, through undersigned counsel, respectfully moves this Honorable Court to continue the February 9, 2026, trial date for the following reasons:

1) Defendant's prior counsel from Quinn Emanuel Urquhart & Sullivan LLP moved to withdraw from the case on December 31, 2025. *See* ECF Nos. 42-44. This Court granted counsel's motions to withdraw on January 15, 2026.
2) While Defendant has had access throughout this matter to the Federal Public Defender, who continues to represent him, Defendant has not had the opportunity to meet and strategize with the Federal Public Defender for more than a few hours.
3) Defendant desires to engage the undersigned counsel to represent him in this matter. For the time-being, the undersigned counsel has been retained solely to file this Motion to Continue the Trial Date to provide time to consider filing dispositive motions that Defendant previously has not had the opportunity to file.

4) Defendant respectfully requests a continuance of three months to May 11, 2026 so that the undersigned counsel may evaluate and file, if appropriate, such dispositive motions and prepare for trial.

5) Should the Court continue the trial date, the undersigned counsel anticipates entering an unlimited appearance in this case.

Respectfully submitted,

By: /s/

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Attorney for Defendant Jose Biaou

CERTIFICATE OF SERVICE

I certify that on this 26th day of January 2026, I caused the foregoing to be filed electronically using the Court's CM/ECF system, which sends a notification of such filing to all counsel of record.

/s/

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