

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

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§

**VS.**

**No. 4:20-cr-00455**

**ZHENG DONG CHENG**

**UNOPPOSED MOTION FOR CONTINUANCE**

TO THE HONORABLE ANDREW S. HANEN, UNITED STATES DISTRICT JUDGE:

Zhengdong Cheng, Defendant, (“Professor Cheng”), respectfully moves the Court for a continuance of the scheduling order until on or after July 11, 2022 good cause would show as follows:

I.

Pretrial Conference is scheduled for March 28, 2022, at 8:30 a.m. and Jury Trial is scheduled for April 4, 2022 at 9:00 a.m.

II.

Counsel for Professor Cheng requests a continuance for the following reasons:

On February 23, 2022, the Department of Justice abandoned the “China Initiative” program that lead to the prosecution of Professor Cheng. Assistant Attorney General Matthew Olsen made the announcement in a speech addressing countering nation-state threats (attachment “A”). The parties have now entered into good faith negotiations to resolve the instant prosecution.

III.

This Motion is made, not for the purpose of delay, but that justice may be done. Counsel requests trial and all accompanying deadlines be reset on or after July 11, 2022.

**CONCLUSION**

WHEREFORE, Professor Cheng, respectfully prays that this Motion be granted, and that the Court continues the trial of this case and all accompanying deadline for at least ninety (90) days from the current trial date.

Respectfully Submitted,

**HILDER & ASSOCIATES, P.C.**

*/S/ Philip H. Hilder*

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2022, a true and correct copy of the foregoing instrument has been served upon the Assistant United States Attorney for the government herein, via ECF contemporaneous with filing.

/S/ Philip H. Hilder  
Philip H. Hilder

**CERTIFICATE OF CONFERENCE**

I certify that on or about February 25, 2022, I communicated with AUSA Carolyn Ferko and he indicated that the government is unopposed to the continuance.

/S/ Philip H. Hilder  
Philip H. Hilder