IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**Case No. 21–498-CJN**
	:	
ANDREW QUENTIN TAAKE	:	
	:	
Defendant	:	

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UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY

COMES NOW, the Defendant Andrew Quentin Taake, by and through counsel, Michael E. Lawlor, and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to extend the time in which Mr. Taake can file his reply to the Government's response to inquiries of the Court during the January 11, 2023 Status Conference.

1.   On January 11, 2023, a status conference was held in this matter.

2.   Thereafter, the Court ordered the Government to respond to the Court's inquiries regarding the medical treatment being received by Mr. Taake while incarcerated. Following the Government's response, the Court Ordered that defense counsel reply to the Government's response on or before April 7, 2023.

3.   Undersigned counsel respectfully files this motion to extend the time in which undersigned counsel is to file Mr. Taake's reply until Monday, April 10, 2023.

Undersigned counsel is in the process of obtaining a medical report from Mr. Taake's healthcare provider prior to filing the response with the Court.

4.   Undersigned counsel discussed this request with counsel for the Government, Barry Disney, Esq., and is authorized to state that the United States consents to this request for an extension to file reply unitl Monday, April 10, 2023.

5.   For these reasons, counsel respectfully asks this Court to extend the time in which Mr. Taake is to file his reply to the Government's response to inquiries of the Court until Monday, April 10, 2023.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 5, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

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Michael E. Lawlor