

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-CR-53 (CJN)
)	
EDWARD JACOB LANG,)	
)	
<i>Defendant.</i>)	

DEFENDANT LANG’S MOTION TO CONTINUE THE MAY 29, 2023 TRIAL DATE

Pursuant to LCrR 57.2(b), Defendant Lang, through undersigned counsel, respectfully requests this Court to continue the trial date of this matter currently scheduled for May 29, 2023 to any date after August 1, 2023 as the Court may see fit, and is convenient for the parties.

In support of this application, Lang respectfully notes for this Court the following: I have been actively engaged on the matter *US v. Nordean, et. al.*, 21-cr-00175 (TJK) this entire year, which involves *inter alia* charges of seditious conspiracy.¹ Last week, Tuesday, Wednesday, and Thursday on the *Nordean* matter, my other client Dominic Pezzola testified. I finalized my closing argument yesterday, as did all the parties. The preparation that went into the last two weeks was overwhelming and substantial to say the least. The jury began deliberating today, and upon reflection during the day, I must stress that all of my energy and time has been poured into the *Nordean* matter. In light of this, I apologize for not having filed this application sooner.

I have tried to predict, but have absolutely no clue, based on the prior oath keepers cases, how long the jury on the *Nordean* matter will deliberate.

¹ This is a five-defendant conspiracy case in the District Court, District of Columbia. This trial commenced on December 19, 2022, and such trial lasted longer than 70 (seventy) trial days.

In addition to all of my New York State pending cases piling up at my office, and me having to extend various deadlines and court appearances because of the *Nordean* matter – I also need to switch gears and prepare for trial on this matter, *US v Edward Lang*.

Accordingly, and for good cause shown, Defendant Lang requests that this Motion to Continue Trial until a date after August 1, 2023, or until a next available convenient time soon thereafter, be granted.

We thank the Court in advance for its consideration and attention on this matter.

Dated: April 26, 2023

/s/ Steven A. Metcalf II

STEVEN A. METCALF II, ESQ.

Metcalf & Metcalf, P.C.

Attorneys for Edward Lang

99 Park Avenue, 6th Floor

New York, NY 10016

Phone 646.253.0514

Fax 646.219.2012

metcalflawnyc@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that, on April 26, 2023, the forgoing document was filed via the Court's electronic filing system, and sent to the AUSA via email, which constitutes service upon all counsel of record.

/s/ Steven A. Metcalf II, Esq.

STEVEN A. METCALF II, ESQ.

Metcalf & Metcalf, P.C.

Attorneys for Edward Lang

99 Park Avenue, 6th Floor

New York, NY 10016

Phone 646.253.0514

Fax 646.219.2012

[*metcalflawnyc@gmail.com*](mailto:metcalflawnyc@gmail.com)