

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

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

Defendant, Edward Jacob Lang, by and through undersigned counsel, Steven Metcalf, respectfully moves this Court for and Order and Finding that Defendant Lang has suffered the deprivation of numerous constitutionally protected due process rights throughout the course of his pre-trial detention. In addition to a finding, its respectfully requests for, inter alai, an order permitting him to possess in his cell a laptop computer so he can review all discovery and participate in his own defense, and to restrain the marshal's from threatening or precluding Lang that he cannot exercise his First Amendment rights in speaking to anyone he so chooses to. Further, this application seeks an Order of dismissal of the Superseding l Indictment, in that, the federal district court has failed to lawfully acquire jurisdiction over the "Person" of Mr. Lang.

THE UNITED STATES COURT DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

_____) UNITED STATES OF AMERICA,)) v.) No. 21-CR-53 (CJN))

EDWARD JACOB LANG,)) Defendant.) _____) Defendant, Edward

Jacob Lang, by and through undersigned counsel, Steven A. Metcalf, respectfully requests the Court for and Order and Finding that Defendant Lang has suffered the deprivation of numerous constitutionally protected due process rights throughout the course of his pre-trial detention. In addition to a finding, its respectfully requests for, inter alia, an order permitting him to possess in his cell a laptop computer so he can review all discovery and participate in his own defense, and to restrain the marshal's from threatening or precluding Lang that he cannot exercise his First Amendment rights in speaking to anyone he so chooses to. Further, this application seeks an Order of dismissal of the Superseding I Indictment, in that, the federal district court has failed to lawfully acquire jurisdiction over the "Person" of Mr. Lang. Respectfully Submitted, /s/ Steven Alan Metcalf II

_____) STEVEN A. METCALF II, ESQ. Metcalf & Metcalf, P.C. 99 Park Avenue, 6 Flr. th New York, NY 10016 (Office) 646.253.0514 (Fax) 646.219.2012 Counsel for Defendant Edward Jacob Lang CERTIFICATE OF SERVICE I hereby certify that, on July 15, 2022, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record. /s/ Steven Alan Metcalf II

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Counsel for Defendant Edward Jacob Lang

CERTIFICATE OF SERVICE

I hereby certify that, on July 15, 2022, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ Steven Alan Metcalf II

STEVEN A. METCALF II, ESQ.

Counsel for Defendant Edward Jacob Lang