

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

UNITED STATES OF AMERICA,

v.

EDWARD JACOB LANG,

Defendant.

No. 1:21-cr-00053

DEFENDANT LANG'S MOTION TO AMEND REVISED SCHEDULING ORDER

Defendant, Edward Jacob Lang, by and through undersigned counsel, Steven A. Metcalf II, respectfully moves this Court to amend the Revised Scheduling Order entered on December 16, 2022.

The basis for this request is based on my inability to meet the current schedule because I have been actively engaged in trial in the federal trial *US v. Nordean, et al.*, before Judge Kelly in the District of Columbia. (*See US v Nordean*, Criminal Action #: 21-175 (TJK)).

The *Nordean* case is a five co-defendant jury trial, where all Defendants remain in custody. On December 19, 2022 the *Nordean* case took off with a slow start, where it took approximately two weeks for us to qualify a jury panel. Thereafter, examinations of particular witnesses have lasted for days at a time. The order of calling witnesses has changed almost on a daily basis, making my daily preparations extend to all late hours of the night. Today begins day thirty-one (31) of this trial. Simply stated, the schedule set in the *Nordean* case has completely changed, which in turn has changed everything from my living situation, currently in Washington, DC to various scheduling conflicts in my office.

Consequently, I am respectfully requesting that Defendant's motion to change venue be

extended to on or before **March 10, 2023**.

Additionally, I am requesting that Defendant's *motions in limine* and his self-defense proffer be extended to on or before **March 17, 2023**. The main basis for this request is that since January 2023, Defendant Lang was transferred to Brooklyn, MDC, whereby I need additional time to speak with Lang since his transfer and my current trial situation to perfect such applications.

I have spoken with AUSA Rochlin via email throughout the last few weeks and via telephone on February 16, 2023, and have been informed that the government will state its position in this response.

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

Dated: February 17, 2023

Respectfully Submitted,

/s/ Steven A. Metcalf II

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CERTIFICATE OF SERVICE

I hereby certify that, on February 17, 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.

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