

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00623 CRC

MICHAEL ECKERMAN

CONSENT MOTION FOR ADDITIONAL TIME IN WHICH FILE PRETRIAL
MOTIONS

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully move this Court to grant him leave for an additional two (2) weeks in which to file any pretrial motions by September 16, 2022.

Attempt to obtain consent

Undersigned counsel contacted Jessica Arco, Esquire, counsel for the government, on her position on this matter and she consents to the granting of this motion.

As grounds therefore, we state as follows:

1. The scheduling order required all counsel to file pretrial motions on or before September 2, 2022.
2. Undersigned counsel has not been able to contact the co-defendant as to how she may proceed. Counsel had hoped for some input on the issue of motions before filing motions.
3. AUSA Arco also informed counsel this date that she has discovered additional videos that are relevant to the two most serious charges against Mr. Eckerman. She expects to them to be available the first part of next week. Counsel would need to see those videos to decide whether they should be the subject of additional pretrial motions.

4. Undersigned counsel has discussed with the defendant his right to demand a speedy trial. He understands that he has that right, but wishes to exclude the time from this date until the proposed new date.

WHEREFORE, we pray that this Motion be granted.

Respectfully submitted,

/s/ Richard S. Stern

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically served all counsel of record on September 1, 2022.

/s/ Richard S. Stern

RICHARD S. STERN