

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00623 CRC

MICHAEL ECKERMAN

UNOPPOSED MOTION FOR ADDITIONAL TIME IN WHICH FILE PRETRIAL
MOTIONS

Comes now the parties, by and through counsel, Richard S. Stern, to respectfully move this Court to grant them leave until September 28, 2022 in which to file any pretrial motions.

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 was amended to require all counsel to file pretrial motions on or before September 16, 2022.

2. The co-defendant is still without counsel and we do not know how she may proceed. Counsel had hoped for some input on the issue of motions before filing motions.

3. AUSA Arco had previously informed counsel that she has discovered additional videos that are relevant to the two most serious charges against Mr. Eckerman. She provided this on September 6th. The additional discovery is very voluminous, over 7 gigabytes which has been hard to fully show to the defendant. Counsel still would need to more of those videos with the defendant to finalize any 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

RICHARD S. STERN
932 Hungerford Drive
Suite 37A
Rockville, MD 20850
301-340-8000
rssjrg@rcn.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically served all counsel of record on September 15, 2022.

/s/ Richard S. Stern

RICHARD S. STERN