

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : No. 21-CR-383
 :
 :
 PATRICK STEDMAN :
 :

CONSENT MOTION TO CONTINUE

Defendant Patrick Stedman, by and through his counsel Rocco C. Cipparone Jr., Esq., with the Consent and agreement of the government, by and through its attorney Peter Lallas, hereby moves the Court to continue the currently set status hearing scheduled for September 30, 2021 to a date in middle to late January 2022, and to exclude the time under the Speedy Trial Act in the interests of justice. In support of the motion the defense states:

1. Discovery in the case is particularly voluminous including copious amounts of video footage, and discovery is ongoing and not yet complete.

2. The defense and the government continue to work cooperatively to ensure that discovery is progressing, and currently there are no issues concerning which the parties believe that Court intervention is necessary.

3. The government has advised that it anticipates still a large amount of additional discovery will need to be provided, that is being collated and organized for more facile presentation in an online database, the arrangements for which still are in progress.

4. The parties, including and particularly the defendant, of course will need adequate time and opportunity to access, review and analyze all discovery in determining appropriate courses of action in this matter.

5. In light of the foregoing, it respectfully is requested that the Court continue the status hearing

from its currently set September 30, 2021 date, to a date in the middle or end of January 2022.

6. I have discussed this motion with my client and there is consent that the time between the filing of this motion and the new date set by the Court if this motion is granted, be excluded from computation under the Speedy Trial Act because the ends of justice in granting the continuance outweigh the interests of the defendant and the public in a speedy trial.

Respectfully submitted,

Law Offices of Rocco C. Cipparone, Jr.

BY: /s/Rocco C. Cipparone Jr.

Rocco C. Cipparone, Jr., Esquire

Dated: 09-28-2021