

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 April 20, 2022 to a date in late July 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. 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. Recently, some uploaded discovery (through no fault of either party) timed out and became no longer available (the defense did not realize the time limit) and the government has agreed to make such discovery available again.

**2.** 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.

**3.** 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.

4. The undersigned counsel begins two essentially back-to-back federal criminal trials in the U.S. District Court for the EDPA: one on May 5, 2022 that will last about 1.5 weeks. The second begins on May 31, 2022, involves approximately 8 defendants, and is expected to last 6-8 weeks by the most recent estimate.

5. In light of the foregoing, including defense counsel's trial schedule, it respectfully is requested that the Court continue the status hearing from its currently set April 20, 2022 date, to a date toward the end of July 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: 04-18-2022