

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00381

STACY WADE HAGER

**JOINT MOTION TO CONTINUE STATUS HEARING**

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully move this Court to continue the present scheduled date of January 12, 2021 to February 1, 3 or 7, 2022 if available to the Court.

**Attempt to obtain consent**

Undersigned counsel contacted Susan Lehr, Esquire, counsel for the government, on her position on this matter and she joins in the granting of this motion.

As grounds therefore, we state as follows:

1. The status hearing is set in this matter for January 12, 2022.
2. The government sent the defendant a draft plea agreement and statement of facts on January 7, 2022, which will remain open until January 28, 2022. Counsel has reviewed the documents with the defendant which has generated concerns on his part and additional discovery issues. Thus the parties will not be able to give the Court an updated status on the 12<sup>th</sup>.
3. Undersigned counsel has discussed with the defendant his right to demand a speedy trial. He understands that he has that right, but wishes to excludes the time from this date until the

proposed new date from any speedy trial calculations to review any additional discovery and negotiate a possible resolution.

4. Counsel have agreed to having the next hearing any morning on February 1, 3 or 7, 2022, if available to the Court.

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 January 10, 2022.

*/s/ Richard S. Stern*

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RICHARD S. STERN