

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 February 7, 2022 to March 1, 2 or 3, 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 February 7, 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. Each side has presented the other with additional discovery which will involve some time to review and make changes to the ultimate plea agreement. Thus the parties will not be able to give the Court an updated status on the present status date.

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 March 1,2 or 3, 2022, if available to the Court.

WHEREFORE, we pray that this Motion be granted.

Respectfully submitted,

*/s/ Richard S. Stern*

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RICHARD S. STERN  
932 Hungerford Drive  
Suite 37A  
Rockville, MD 20850  
301-340-8000  
[rssjrg@rcn.com](mailto:rssjrg@rcn.com)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically served all counsel of record on February 3, 2022.

*/s/ Richard S. Stern*

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RICHARD S. STERN