

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 1:21-CR-381-TSC</b>
<b>v.</b>	:	
	:	
<b>STACY WADE HAGER,</b>	:	
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S CONSENT MOTION TO CONTINUE STATUS HEARING**

The United States of America, through undersigned counsel, respectfully moves the Court to continue the status hearing currently scheduled for Monday, March 14, 2022, for a period of 30-45 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the undersigned represents:

1. A plea agreement has been tendered to Mr. Hager. The parties are actively involved in negotiations in attempting to resolve this matter short of trial. Based on those discussions, additional discovery is being undertaken that requires the coordination of a number of people’s schedules. When that is completed, time will be needed for that information to be given to the defense and for the defendant to have time to consult with his counsel
2. Despite diligent efforts by the parties, an additional 30 to 45 days, from March 14, is necessary to allow the parties to continue their discussions.

WHEREFORE, the government respectfully requests that this Court grant the motion for a 30 to 45 day continuance of the above-captioned proceeding, and that the Court exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq., on the basis that the ends of justice served by taking such actions outweigh the best interest of the

public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv).

Respectfully submitted,  
MATTHEW M. GRAVES  
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By: /s/ Susan T. Lehr  
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# CERTIFICATE OF SERVICE

I hereby certify that March 3, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Susan T. Lehr  
SUSAN T. LEHR  
Assistant United States Attorney