

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 June 14, 2022 to June 29, 30, 2022 or July 1, 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/plea hearing is set in this matter for June 14, 2022.

2. The need for some additional discovery and review of other matters have arisen to finalize the plea negotiations.

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 June 29, 30, 2022 or July 1, 2022, if available to the Court.

WHEREFORE, we pray that this Motion be granted.

Respectfully submitted,

/s/ Richard S. Stern

RICHARD S. STERN
932 Hungerford Drive
Suite 37A
Rockville, MD 20850
301-340-8000
rssjrg@rcn.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically served all counsel of record on June 10, 2022.

/s/ Richard S. Stern

RICHARD S. STERN