

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Criminal No: 1:21CR0239
	)	
NICHOLAS B. REIMLER,	)	
	)	
Defendant.	)	

CONSENT MOTION TO CONTINUE STATUS HEARING  
AND FOR EXCLUDABLE DELAY

COMES NOW Defendant herein, **NICHOLAS B. REIMLER**, by and through the undersigned counsel of record, Ethan B. Corlija, and respectfully files this consent motion to continue the status hearing in the above-captioned matter from June 10, 2021, until July 19, 2021, at two (2) o'clock in the afternoon (EDT).

The United States of America, by and through its attorney, Assistant United States Attorney for the District of Columbia, Janani Iyengar, and the Defendant agree that there is good cause to exclude time under the Speedy Trial Act from June 10, 2021, until July 19, 2021. The Government concurs in this request and agrees that it is in Defendant's best interest. In support thereof, the Defendant states as follows:

1. The legal counsel for the Defendant and the Government have conferred and are continuing to communicate in an effort to resolve this matter. Negotiations to the resolve the case are

nearing finality. The Government has also indicated that additional discovery material will be disclosed in this matter and defense counsel will need time to review the material and discuss it with Defendant.

2. The parties, therefore, would respectfully request that the status hearing and the date by which an Information or an Indictment must be filed be continued until July 19, 2021. The parties agree that the failure to grant this continuance "would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, "the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial," 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from June 10, 2021, through July 19, 2021, shall be excluded in computing the date for speedy trial in this case.

**WHEREFORE**, the parties respectfully request that the Court continue the status hearing in this matter until July 19, 2021, at two (2) o'clock in the afternoon (EDT).

Respectfully Submitted,

**ETHAN B. CORLIJA**  
**ATTORNEY AT LAW**

/s/ Ethan B. Corlija  
Ethan B. Corlija  
Bar Number: MO0020  
5205 Hampton Avenue  
St. Louis, Missouri 63109  
Telephone: 314-832-9600  
Facsimile: 314-353-0181  
E-Mail: ecorlija@sbcglobal.net

**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I, Ethan B. Corlija, legal counsel for Defendant herein, **NICHOLAS B. REIMLER**, certify that a true and accurate copy of the forgoing Consent Motion to Continue Status Hearing and for Excludable Delay has been forwarded to counsel of record for the United States of America at the following address: Ms. Janani Iyengar, Assistant United States Attorney, United States Attorney's Office, District of Columbia, 555 Fourth (4th) Street, Northwest, Washington, District of Columbia 20001, this 9th day of June 2021.

/s/ Ethan B. Corlija  
Ethan B. Corlija Bar #MO0020

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Criminal No: 1:21CR0239
	)	
NICHOLAS B. REIMLER,	)	
	)	
Defendant.	)	

ORDER

This matter having come before the Court pursuant to a Motion to Continue, upon consent, it is therefore:

ORDERED that, after taking into account the public interest in the prompt disposition of criminal cases, good cause exists to continue the currently scheduled status hearing from June 10, 2021, to July 19, 2021, at two (2) o'clock in the afternoon (EDT); it is:

FURTHER ORDERED that the period from June 10, 2021, to July 19, 2021, be excluded from computing the time within which an Information or Indictment must be filed under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the best interests of the public and Defendant in a speedy trial. See 18 U.S.C., § 3161(h)(7). The Court finds that the parties are in discussions to reach a pre-trial resolution and to discuss discovery matters.

It Is So Ordered:

---

HONORABLE JUDGE RANDOLPH D. MOSS  
United States District Judge

Entered: \_\_\_\_\_