

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

\*

vs.

\*

Case No.: 21-cr-00498-CJN

ANDREW Q. TAAKE

\*

Defendant

\*

\*\*\*\*\*

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND  
EXCLUSION OF TIME FROM CALCULATION UNDER THE SPEEDY  
TRIAL ACT**

COMES NOW, the Defendant Andrew Q. Taake, by and through counsel, Michael E. Lawlor, and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for Friday, April 1, 2022, and exclude certain time from the Speedy Trial Act calculation in this case. In support of this Motion, counsel states the following:

1. Per prior Order of the Court, Mr. Taake is scheduled to appear before this Honorable Court on Friday, April 1, 2022 at 11:30 a.m. for a status conference in the above-referenced case.

2. Undersigned counsel respectfully asks for a 7-day continuance of the status conference, and the exclusion of that time for Speedy Trial purposes, for the following reasons.

- a. Undersigned counsel is requesting additional time to meet with the defendant to review discovery in this case. Due to staffing issues at the institution where Mr. Taake is being held, April 1, 2022 is the only date counsel is permitted to meet with Mr. Taake.
  - b. Undersigned counsel intends to continue discussions with the United States and Mr. Taake about a possible resolution in this case, but requires additional time to do so.
3. Undersigned counsel has discussed this request with Mr. Taake, and is authorized to state that he is in agreement with the instant request, and consents to exclusion of time under the Speedy Trial Act.
4. Undersigned counsel has also contacted Assistant United States Attorney Laura Elizabeth Hill, and is authorized to state that the United States does not oppose this motion.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the current status conference date for a period of approximately 7 days, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

---

Michael E. Lawlor, Bar ID: 459767  
Brennan, McKenna & Lawlor, Chtd.  
6305 Ivy Lane, Suite 700  
Greenbelt, Maryland 20770  
301.474.0044  
[mlawlor@verizon.net](mailto:mlawlor@verizon.net)

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 25, 2022, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

---

Michael E. Lawlor