

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 CASE SETTING**  
**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 case setting in the above-captioned matter from July 19, 2021, to September 17, 2021, at 2:30 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 July 19, 2021, until September 17, 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 diligently in an effort to resolve this matter. Negotiations to the resolve the case are nearing finality.

2. Legal counsel for Defendant and the Government have been engaged in an ongoing exchange of information and documentation which will likely lead to a final disposition in the case. Legal counsel for the Government stated as recently as Wednesday, July 14, 2021, that additional documentation pertaining to a potential plea agreement would be conveyed to Defendant. Once such documentation is received, defense counsel will need sufficient time to thoroughly discuss same with Defendant in preparation for a change of plea hearing.

3. The Government has also indicated that additional discovery material potentially exists. The Government has stated that this material would be fully disclosed to defense counsel and Defendant as expeditiously as possible. Therefore, defense counsel will need sufficient time to review any additional discovery material disclosed by the Government to Defendant.

4. The parties, therefore, would respectfully request that a change of plea hearing be set on September 17, 2021, at 2:30 o'clock in the afternoon. Accordingly, the parties agree that 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 July 19, 2021, through September 17, 2021, shall be excluded from computing the date for speedy trial in this case.

**WHEREFORE**, the parties respectfully request that the Court set a hearing in this matter on September 17, 2021, at 2:30 o'clock in the afternoon (EDT).

Respectfully Submitted,

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

/s/ Ethan B. Corlija  
Ethan B. Corlija  
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**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 16th day of July 2021.

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

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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 Court date from July 19, 2021, to September 17, 2021, at 2:30 o'clock in the afternoon (EDT); it is:

FURTHER ORDERED that the period from July 19, 2021, to September 17, 2021, be excluded from computing time 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 advanced discussions to reach a pre-trial resolution.

It Is So Ordered:

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HONORABLE JUDGE RANDOLPH D. MOSS  
United States District Judge

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