

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
PETER STAGER, )  
 )  
Defendant. )  
 )  
\_\_\_\_\_ )

Criminal No. 1:21-cr-35-EGS-2

**DEFENDANT’S MOTION FOR LEAVE TO LATE FILE**  
**DEFENDANT’S WAIVER OF SPEEDY TRIAL RIGHTS**

Peter Stager, by and through undersigned counsel, respectfully moves this Honorable Court to grant leave to late file Mr. Stager’s speedy trial waiver. In support of this motion, undersigned counsel states the following:

1. When defense counsel attempted to visit Mr. Stager today to obtain his signature on the waiver to file with the Court, defense counsel was delayed entry to the facility due to unforeseen circumstances.
2. The government’s motion is not prejudiced by the filing of Mr. Stager’s waiver at this time, as he is consenting to what is requested in the government’s motion.

WHEREFORE, for the foregoing reasons and any other that this Court may deem just and proper, Mr. Stager respectfully requests that this Court grant Mr. Stager leave to late file the aforementioned motion.

\_\_\_\_\_/s/\_\_\_\_\_

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*Counsel for Peter Stager*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of October 2022, I caused a true and correct copy of the foregoing Defendant's Motion for Leave to Late File Defendant's Waiver of Speedy Trial Rights to be delivered via CM/ECF to Assistant United States Attorney, Benet Kearney, One Saint Andrew's Plaza New York, New York 10007.

\_\_\_\_\_/s/\_\_\_\_\_  
Rammy G. Barbari