

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

vs.

EZEKIEL KURT STECHER

Defendant

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Case No.: 21-cr-720 TFH

**CONSENT MOTION FOR CONTINUANCE AND EXCLUSION OF TIME
FROM CALCULATION UNDER THE SPEEDY TRIAL ACT**

COMES NOW, the Defendant Ezekiel Kurt Stecher, by and through counsel, Michael E. Lawlor and Nicholas G. Madiou and, Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for Friday, April 8, 2022 at 2:00 p.m., 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, the Mr. Stecher is scheduled to appear before this Honorable Court on Friday, April 8, 2022 at 2:00 p.m. for a status conference.

2. For the following reasons, undersigned counsel respectfully asks for an approximately 90-day continuance of the status confernece, and the exclusion of that time for Speedy Trial purposes, for the following reasons.

- a. The United States of America and counsel for Mr. Stecher are currently engaged in plea negotiations;
 - b. Undersigned counsel requires additional time to continue to review the discovery and discuss any possible plea with the defendant.
3. Undersigned counsel has discussed this request with Mr. Stecher, 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 Emory Vaughan Cole, 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 90 days, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 7, 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