

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No. 1:21-cr-00310-ABJ**  
 :  
**JOSHUA WAGNER** :  
 :  
 **Defendant.** :

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**MOTION TO CONTINUE STATUS DATE**

Comes Now, Joshua Wagner, by counsel, and respectfully moves this Court to continue the above-listed matter, currently set for status on October 6, 2021 at 2 p.m. to November 5, 2021 or such other time thereafter which is convenient to the court and the parties for entry of a plea. As grounds for his motion, Mr. Wagner states that (1) he needs additional time to review plea documents and prepare for a plea hearing with counsel; and (2) counsel is unavailable between October 7 and October 24 due to pre-arranged travel out of state. Counsel for Mr. Wagner has discussed this matter with the government, and the government does not oppose this motion or the requested date. Counsel for Mr. Wagner is also available on November 15, 16, 22, and 23, 2021. (And many other dates thereafter).

Mr. Wagner agrees to waive his constitutional and statutory rights to a speedy trial between October 6, 2021 and the date of his plea.

For the above stated reasons, Mr. Wagner respectfully requests that his motion be granted.

Respectfully submitted,

By Counsel

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

Christopher Leibig, Esq.  
Virginia Bar No. 40594  
Counsel for Defendant  
114 N. Alfred Street  
Alexandria, Virginia 22314  
(703) 683 4310  
[chris@chrisleibiglaw.com](mailto:chris@chrisleibiglaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of October 2021, I will electronically file the foregoing Notice with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

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

Christopher Leibig