

**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 Thursday, November 17, 2022 at 11:00 a.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, Mr. Stecher is scheduled to appear before this Honorable Court on Thursday, November 17, 2022 at 11:00 a.m. for a status conference.

2. For the following reasons, undersigned counsel respectfully asks for a 60-day continuance of the status conference, and the exclusion of that time for Speedy Trial purposes, for the following reasons:

- a. Undersigned counsel is scheduled to begin a murder trial in the matter of *State of Maryland v. Calvin Stevens* – case no: *120070001* in the Circuit Court for Baltimore City on Tuesday, November 15, 2022.
- b. Additionally, the Government has extended a written plea offer in this case. Undersigned counsel seeks an additional 60-day continuance of the scheduled status conference to meet with Mr. Stecher and review the plea offer in this case with him.

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 the 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 consents to the relief sought in 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 60 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 November 15, 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