

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

UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIM NO. 21-CR-411 (APM)
STEWART PARKS)	
)	
and)	Judge: Mehta
)	
MATTHEW BAGGOTT)	
)	Status Date: December 17, 2021
Defendant.)	

UNOPPOSED MOTION TO CONTINUE STATUS DATE

COMES NOW Defendant Stewart Parks, through counsel, and, without opposition from codefendant or from the government, moves to continue the status date currently scheduled for December 17, 2021. As reasons therefor, defendant states as follows:

1. On June 10, 2021, undersigned counsel was appointed to represent Stewart Parks in the present matter. On or about the same date, attorney Dumaka Shabazz was appointed to represent Mr. Parks’ codefendant, Matthew Baggott.

2. Defense counsel have been provided with voluminous discovery by the government which includes over 100 hours of videos. It is defendant’s understanding that there is still additional discovery which is still being processed

and will be provided soon.

3. Defense counsel need additional time to review the discovery in order to determine how to proceed with this case.

4. In addition, defendant Stewart Parks, having been permitted to do so under previous order of the court, is out of the country on business, which has limited undersigned counsel's ability to discuss the matter with his client.

5. It is anticipated that more progress will be made if this matter is continued for thirty (30) days to allow further time to review discovery.

6. Both defendants agree to waive any and all time under the Speedy Trial Act between now and any new scheduled status date.

7. Undersigned counsel has contacted AUSA Benet Kearney and counsel for codefendant Matthew Baggott, Dumaka Shabazz, who both indicate they do not oppose this motion.

WHEREFORE, defendant Stewart Parks respectfully requests that the status on this matter be continued for approximately 30 days, to sometime in mid-January.

Respectfully submitted,

STEWART PARKS

/s/ John L. Machado

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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 13th day of December, 2021, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado

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