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January 18, 2022

VIA ECF

The Honorable Judge Carl Nichols
U. S. District and Bankruptcy Courts for the District of Columbia
333 Constitution Avenue, N.W.
Washington, D.C. 20001

Re: USA v. Edward Jacob Lang, 21-cr-0053 CJN

Your Honor,

Please accept this letter as a formal motion to adjourn today’s scheduled status conference at 2:00pm. The reasons for our request are, *inter alia*, primarily based on the health and well-being of Martin Tankleff (co-counsel on this matter, attorney from my office) and myself.

Last week, attorney Tankleff and myself were in a serious car accident, where my truck was completely totaled. After the accident we had to seek medical treatment. I found out over the weekend that I actually fractured my L2. The doctor referred to my injury as a “spinal fracture”. Thankfully my understanding is that my fracture is away from my spine, and will not require immediate emergency surgery.

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Attorney Tankleff from my office also was injured in this accident and has been receiving medical treatment since as well.

Needless to say, we are still attempting to heal and need to speak further with Mr. Lang.

Additionally, Mr. Lang remains in quarantine and cannot attend virtually.

In light of this, we are respectfully requesting that today's status conference be adjourned to January 27, 2022 at 10:00 am. AUSA Rochlin consents and does not object to our request.

An adjournment of this status conference is in the interests of justice. Defendant Lang hereby waives speedy trial between today and the next adjourned date. Additionally, a short adjournment serves to not only allow Marty and I to get better, but also allows counsel the ability to have our planned conference with the Government, and allow Defendant Lang to get out of quarantine and appear virtually.

I thank the Court in advance for its kind courtesies in light of our recent accident. My cell phone number is 631.521.1499.

Respectfully Submitted,


STEVEN METCALF, ESQ.

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