

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 21–498-CJN
 :
 ANDREW QUENTIN TAAKE :
 :
 Defendant :
 :

**UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY AND
CONTINUE STATUS CONFERENCE AND EXCLUSION OF TIME FROM
CALCULATION UNDER THE SPEEDY TRIAL ACT**

COMES NOW, the Defendant Andrew Quentin Taake, by and through counsel, Michael E. Lawlor, and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to extend the time in which Mr. Taake can file his reply to the Government’s response to inquiries of the Court during the January 11, 2023 Status Conference and continue the status conference currently set for February 27, 2023 at 1:30 p.m.

1. On January 11, 2023, a status conference was held in this matter.
2. Thereafter, the Court ordered the Government to respond to the Court’s inquiries regarding the medical treatment being received by Mr. Taake while incarcerated. Following the Government’s response, the Court Ordered that defense counsel reply to the Government’s response on or before February 24, 2023.
3. A follow up status conference was set February 27, 2023 at 1:30 p.m.

4. Undersigned counsel respectfully files this motion to extend the time in which undersigned counsel is to file Mr. Taake's reply and to continue the status conference by approximately 30 days. Undersigned counsel makes this request because counsel has obtained a medical expert to review pertinent medical records in this case.

5. Undersigned counsel discussed this request with counsel for the Government, Barry Disney, Esq., and is authorized to state that the United States consents to this request for an extension to file reply and continuance of the February 27, 2023 status conference.

6. For these reasons, counsel respectfully asks this Court to extend the time in which Mr. Taake is to file his reply to the Government's response to inquiries of the Court during the January 11, 2023 Status Conference and continue the status conference set for February 27, 2023 by approximately 30 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 February 23, 2023, 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