

**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 March 24, 2023.

3. A follow up status conference is currently set March 31, 2023 at 2:00 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 14 days. Undersigned counsel has obtained a medical expert to review pertinent medical records in this case. Additional time is needed to complete the review of the records and draft the response.

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 March 31, 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 and continue the status conference set for March 31, 2023 by approximately 14 days and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

Michael E. Lawlor
Brennan, McKenna & Lawlor, Chtd.
6305 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
301.474.0044
mlawlor@verizon.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 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