

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 CONTINUE STATUS CONFERENCE AND
EXCLUSION OF TIME FROM CALCULATION UNDER THE SPEEDY
TRIAL ACT**

The Defendant, Andrew Quentin Taake, by and through counsel, Michael E. Lawlor, and Nicholas G. Madiou, Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for May 31, 2023 and exclude this time from the Speedy Trial Act calculation in this case. In support of this motion, counsel states the following:

1. This Court has scheduled a Status Conference on May 31, 2023, at 1:00 p.m. Undersigned counsel respectfully files this motion to continue the Status Conference currently scheduled for the following reasons:

- a. The parties are close to resolving this case by way of a plea agreement. The defense is waiting to receive the Government’s written plea offer. Once received counsel will require time to review the agreement with Mr. Taake; and

b. Government counsel is currently in trial and unavailable to appear for the Status Conference currently scheduled.

2. 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 motion to continue.

3. For these reasons, counsel respectfully asks this Court to continue the current Status Conference scheduled for May 31, 2023 for approximately 30 days and exclude this time from the Speedy Trial Act calculation in this case.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 30, 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