

**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 July 5, 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 July 5, 2023, at 2:00 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 received the Government’s written plea offer and would like additional time to review the agreement with Mr. Taake.

2. Undersigned counsel discussed this request with counsel for the Government, Madison Mumma, Esq., and is authorized to state that the United States consents to this motion to continue.

3. Government counsel is in trial through July 19, 2023 but is available after to reschedule.

4. For these reasons, counsel respectfully asks this Court to continue the current Status Conference scheduled for July 5, 2023 to a date after July 19, 2023 that is convenient to the Court and all parties and exclude this time from the Speedy Trial Act calculation in this case.

Respectfully submitted,

/s/

Michael E. Lawlor
Nicholas G. Madiou
Brennan, McKenna & Lawlor, Chtd.
6305 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
301.474.0044
mlawlor@verizon.net
nmadiou@brennanmckenna.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 29, 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