

**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	:	

CONSENT MOTION TO FOR APPROPRIATE RELIEF

COMES NOW, the Defendant, Andrew Quentin Taake, by and through his counsel, Michael E. Lawlor, Nicholas G. Madiou, and Brennan, McKenna & Lawlor, Chtd., and files this motion for appropriate relief seeking an order of this Court directing the D.C. Department of Corrections and the USP Lewisburg (U.S. Marshals) to produce medical records for Mr. Taake. In support of this motion, counsel respectfully states as follows:

1. Mr. Taake is charged with various offenses stemming from the storming of the United States Capitol on January 6, 2021. He is currently being held at the Correctional Treatment Facility in Washington, D.C.
2. Mr. Taake was arrested in the Southern District of Texas and was held without bond. Mr. Taake made his initial appearance in this Court on October 6, 2021 and was ordered to remain detained pending trial in this matter.
3. Thereafter, Mr. Taake was originally held in this District in the D.C.

Central Detention Facility. Mr. Taake was then transferred to the United States Penitentiary, in Lewisburg, Pennsylvania. Only to be returned to the D.C. Department of Corrections, where he is currently housed.

4. Undersigned counsel respectfully files this Motion with the Court seeking an Order directing the D.C. Department of Corrections and USP Lewisburg (U.S. Marshals) to release any and all medical records pertaining to Mr. Taake during his time of incarceration on this case. The medical records sought are critical for undersigned counsel's representation in this matter including but not limited to potential presentation of mitigation at sentencing and further investigation of the quality of medical care provided to Mr. Taake.

5. Assistant United States Attorney, Madison Mumma, consents to the relief sought in this motion.

6. For these reasons, undersigned counsel respectfully files this Motion for Appropriate relief seeking an Order of this Court directing the D.C. Department of Corrections and the USP Lewisburg (U.S. Marshals) to produce medical records for Mr. Taake.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19, 2023 a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via ECF.

/s/

Michael E. Lawlor