

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

EDWARD JACOB LANG,

Defendant.

No. 1:21-cr-00053

DEFENDANT LANG'S MOTION TO AMEND SCHEDULING ORDER

Defendant, Edward Jacob Lang, by and through undersigned counsel, Steven A. Metcalf II, respectfully moves this Court to amend the Scheduling Order entered on May 2, 2022. (Dkt. 60).

The basis for this request are, *inter alia*, the following: (1) Global Discovery is still ongoing, (2) Discovery Production 16 was provided as recent as this week, (3) case specific discovery is voluminous and still under review; and (4) Defendant wants to reserve his right to make demands for materials and transcripts of the House Committee proceedings that recently resumed.

In light of this, Defendant proposes the following amendments to the first three paragraphs of the May 2, 2022 scheduling order:

- (1) By **July 19, 2022**, Defendant shall make discovery requests of the Government, **if any**. The Government shall have until **August 10, 2022** to respond to the Defendant's discovery requests.

IN THE UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, v. No. 1:21-cr-00053

EDWARD JACOB LANG, Defendant. DEFENDANT LANG'S MOTION TO AMEND SCHEDULING ORDER

(2) Edward Jacob Lang, by and through his undersigned counsel, Steven A. Metcalf II, respectfully moves this Court to amend the Scheduling Order entered on May 2, 2022. (Dkt. 60). The basis for this request are, inter alia, the following: (1) Global Discovery is still ongoing, (2) Discovery Production 16 was provided as recent as this week, (3) case specific discovery is voluminous and still under review, and (4) Defendant wants to reserve his right to make demands for materials and transcripts of the House Committee proceedings that recently resumed. In light of this, Defendant proposes the following amendments to the first three paragraphs of the May 2, 2022 scheduling order: (1) By July 19, 2022, Defendant shall make discovery requests of the Government, if any. The Government shall have until August 10, 2022 to respond to the Defendant's discovery requests. Page 1 of 3 (2) Any motions to discover, along with any pretrial proffer supporting a claim of self-defense, shall be filed by August 17, 2022. Oppositions to any such motions shall be filed by September 7, 2022. Any reply shall be filed by September 14, 2022. (3) The Defendant shall file any motions raising constitutional challenges by July 15, 2022. Oppositions to any such motions shall be filed by August 24, 2022. Any reply shall be filed by September 7, 2022. I have spoken with AUSA Rochlin via telephone and email, and have been informed that the United States takes no position on the instant request to extend the deadlines indicated above and defers to the Court on the decision to grant leave to file out of time. I thank the Court in advance for its consideration and attention on this matter. Dated: June 29, 2022 /s/ Steven A. Metcalf II

STEVEN A. METCALF II, ESQ. Metcalf & Metcalf, P.C. Attorneys for Lang, 99 Park Avenue, 25th Floor New York, NY 10016 Phone 646.253.0514 Fax 646.219.2012 metcalflawnyc@gmail.com Page 2 of 3 CERTIFICATE OF SERVICE I hereby certify that, on June 29, 2022, the foregoing document was filed via the Court's electronic filing system, and sent to the AUSA via email, which constitutes service upon all counsel of record. /s/ Steven A. Metcalf II, Esq.

STEVEN A. METCALF II, ESQ. Metcalf & Metcalf, P.C. Attorneys for Lang, 99 Park Avenue, 25th Floor New York, NY 10016 Phone 646.253.0514 Fax 646.219.2012 metcalflawnyc@gmail.com Page 3 of 3

and defers to the Court on the decision to grant leave to file out of time.

I thank the Court in advance for its consideration and attention on this matter.

Dated: June 29, 2022

/s/ Steven A. Metcalf II

STEVEN A. METCALF II, ESQ.
Metcalf & Metcalf, P.C.
Attorneys for Lang
99 Park Avenue, 25th Floor
New York, NY 10016
Phone 646.253.0514
Fax 646.219.2012
metcalflawnyc@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that, on June 29, 2022, the forgoing document was filed via the Court's electronic filing system, and sent to the AUSA via email, which constitutes service upon all counsel of record.

/s/ Steven A. Metcalf II, Esq.

STEVEN A. METCALF II, ESQ.

Metcalf & Metcalf, P.C.

Attorneys for Lang

99 Park Avenue, 25th Floor

New York, NY 10016

Phone 646.253.0514

Fax 646.219.2012

metcalflawnyc@gmail.com