

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

_____)	
UNITED STATES,)	
)	
v.)	Crim. No. 21cr40
)	Hon. Trevor McFadden
CHRISTOPHER JOSEPH QUAGLIN,)	
Defendant.)	
_____)	

DEFENDANT’S MOTION
FOR A CONTINUANCE AND EXTENSION OF PRETRIAL MOTIONS

Pursuant to Rule 45(b)(1)(b) of the Federal Rules of Criminal Procedure, Christopher Joseph Quaglin, through his attorney, Joseph D. McBride, Esq., respectfully requests that this Honorable Court extend the pretrial motions deadline and continue this case into the new year.

Undersigned counsel contracted COVID 19 in May of 2022 and has not yet fully recovered. Lingering and disruptive symptoms prompted undersigned counsel to pursue specialized testing, during which, he discovered that he has Chronic Lyme Disease. Undersigned counsel has been informed by his physicians that he needs to take an aggressive course of action to eradicate and neutralize this condition. He began preliminary treatment to combat his illness on Thursday, July 7, 2022. Undersigned counsel has been informed that his condition is lifelong but that he will be able to resume life as close to normal as possible after treatment. (See Exhibit A)

Treatment and recovery are expected to take somewhere between two to three months. Coordinating management of care between undersigned counsel’s residences in New York City and Washington, DC, a pharmaceutical regimen with poorly tolerated drugs, medical treatment, stress management, significant lifestyle changes, visits to various specialists located far from undersigned counsel’s residence, and the need for rest, are a few of the things essential to the treatment and recovery process. (See Exhibit A)

Undersigned counsel has spoken with AUSA Kimberly Paschall regarding his extension request. AUSA Paschall has not yet taken a position regarding undersigned counsel's request, as she is weighing different options that address the global nature of this multi-defendant case. Undersigned counsel has also discussed this situation with his client, Mr. Quaglin, who has no objection to any request for an extension or continuance.

While undersigned counsel is expected to recover, he does not have an exact timetable regarding recovery. Nor does he clearly see his capacity to work during that time. Undersigned counsel recognizes that his requests impose an imposition on the Government and the Court. Still, the effects he has been experiencing have taken him by surprise and frankly leave him no other option than to make this Motion and alert this Honorable Court to the situation.

Undersigned counsel submits that moving for a medically related extension is responsible because it allows him to temporarily prioritize his health over the demands of his cases without hurting his client. It also demonstrates respect for the court by freeing up its calendar for other cases that are trial ready.

Thus, having demonstrated good cause, Mr. Quaglin respectfully asks this Court to extend the due dates for Pretrial Motions and to continue this case into the new year.

Dated: New York, NY
July 27, 2022

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

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