

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

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 1:21-cr-00201-DLF-2
	)	
MICHAEL AARON QUICK,	)	
STEPHEN BRIAN QUICK,	)	
ZACHARY HAYES MARTIN,	)	
	)	
Defendant.	)	

**MOTION FOR CONTINUANCE**

COMES NOW defendant by and through Counsel Joseph S. Passanise and Taylor Sumners of the WAMPLER AND PASSANISE LAW OFFICE and moves the Court for a continuance of Plea Agreement Hearing scheduled for November 4, 2021 at 1:00 p.m. in accordance with the Legal Suggestions attached hereto:

**LEGAL SUGGESTIONS**

1. This cause is currently set for Plea Hearing on November 4, 2021.
2. Counsel spoke with co-defendant’s counsel Mr. Vanegas who does not object to a continuance of this hearing.
3. Counsel is in the process of obtaining and reviewing the newly submitted discovery from the U.S. Attorney office in this matter.
4. Counsel is dealing with the sudden death of law partner, Dee Wampler.
5. Counsel received an e-mail from AUSA Brenda Johnson, and she does not object to this continuance. However, we have not discussed the length of time for the continuance.

WHEREFORE, counsel prays for an order herein that the Plea Hearing herein be continued and for such other and further relief as the Court deems just and proper.

Respectfully Submitted

/s/Joseph Passanise  
JOSEPH S. PASSANISE, MO Bar #46119  
TAYLON SUMNERS, MO Bar #73114  
Attorneys for Defendant

WAMPLER & PASSANISE  
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#### **Certificate of Service**

I hereby certify that on October 29, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to U.S. Attorney, Springfield, Missouri.

/s/Joseph Passanise  
Joseph S. Passanise  
Taylon Sumners  
Attorneys at Law