

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

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

MOTION TO TOLL SPEEDY TRIAL CLOCK

COMES NOW by Defendants and through counsel Joseph S. Passanise and Taylon Sumners of WAMPLER & PASSANISE LAW OFFICE, and requests the speedy trial clock be tolled under 18 U.S.C. §3161(h)(7)(a), based on the granting of Defendant’s Motion for Continuance. Defendant previously filed a Motion for Continuance on October 29, 2021, due to the sudden passing of Defense Counsel’s law partner, Dee Wampler. Defense Counsel seeks to toll the speedy trial clock until December 20, 2021 to allow flexibility in coordinating a new date with the Government and this Court. Defense Counsel has advised the Defendants of their rights pursuant to 18 U.S.C. §3161(h)(7)(a) and the Defendants consent to Defense Counsel’s filing of this Motion.

WHEREFORE, Defense Counsel requests that this Court toll the speedy trial clock until December 20, 2021 and for such further relief as this Court deems just.

Respectfully Submitted,

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

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Certificate of Service

I hereby certify that on November 3, 2021, I electronically filed the foregoing with the U.S. District Court Clerk using the CM/ECF system which sent notification of such filing to U.S. Attorney, Washington, DC.

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