

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00381

STACY WADE HAGER

JOINT MOTION TO CONTINUE STATUS HEARING

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully move this Court to continue the present scheduled date of September 10, 2021 to October 7,8 or 11, 2021 if available to the Court.

Attempt to obtain consent

Undersigned counsel contacted Susan Lehr, Esquire, counsel for the government, on her position on this matter and she joins in the granting of this motion.

As grounds therefore, we state as follows:

1. The status hearing is set in this matter for September 10, 2021.
2. The parties wish to complete discovery and other matters, which are substantial, and need the additional time.
3. Undersigned counsel has discussed with the defendant his right to demand a speedy trial. He understands that he has that right, but wishes to excludes the time from this date until the proposed new date from any speedy trial calculations to review discovery and to investigate other matters.

WHEREFORE, we pray that this Motion be granted.

Respectfully submitted,

/s/ Richard S. Stern

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically served all counsel of record on September 9, 2021.

/s/ Richard S. Stern

RICHARD S. STERN