

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00381

STACY HAGER

**CONSENT MOTION FOR ADDITIONAL TIME IN WHICH FILE PRETRIAL
MOTIONS**

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully move this Court to grant both sides leave for an additional two (2) weeks in which to file any pretrial motions by January 27, 2023.

Attempt to obtain consent

Undersigned counsel contacted Adam Michael Dreher, Esquire, counsel for the government, on his position on this matter and he consents to the granting of this motion.

As grounds therefore, we state as follows:

1. The scheduling order required all counsel to file pretrial motions on or before January 13, 2023.
2. The Court approved an investigator for the defendant in this case on December 22, 2022. The investigator has developed some leads and as a result the undersigned has made additional discovery requests of the government. Counsel wishes to get that input before filing motions.
3. Subject to the Court's approval, we seek leave until January 27, 2023 for both sides to file motions.

4. 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 until the proposed new date.

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 January 11, 2023.

/s/ Richard S. Stern

RICHARD S. STERN