

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00381

STACY HAGER

**JOINT MOTION FOR ADDITIONAL TIME IN WHICH FILE
EXHIBIT LISTS**

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 February 17, 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 February 3, 2023.
2. The Court approved an investigator for the defendant in this case on December 22, 2022, who has found additional footage that we may wish to introduce as exhibits. The parties are also exploring the filing of a joint exhibit list which could streamline the litigation for all parties and the Court.
3. Subject to the Court's approval, we seek leave until February 17, 2023 for both sides to file their exhibits, either jointly or otherwise.

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 February 3, 2023.

/s/ Richard S. Stern

RICHARD S. STERN