

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00381

STACY HAGER

**JOINT MOTION TO CONTINUE PRETRIAL CONFERENCE DATE AND EXTEND  
TIME FOR ALL OTHER MATTER**

Comes now the parties, by and through their attorneys, to respectfully move this Court to continue the pretrial conference hearing until March 14 or 16 and extend due dates for exhibits and all other matters until March 10, 2023.

**Attempt to obtain consent**

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

As grounds therefore, we state as follows:

1. The scheduling order required all counsel to file their exhibit list by February 16, 2023, and other matters on February 17, 2023.
2. Since the last motion was filed, the defense investigation has uncovered other discovery matters that need to be resolved to give the Court all the information needed for the pretrial conferences. Also at that point, the issue of exhibits will also need to be resolved.
3. Both sides wish to avoid presenting new issues, discovery or otherwise, after the pretrial conference and it will also help resolve many issues as to of exhibits and possibly streamline the trial.

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 exclude 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 16, 2023.

*/s/ Richard S. Stern*

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RICHARD S. STERN