

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES

v.

Case No. 21-cr-00381

STACY HAGER

**CONSENT MOTION TO CONTINUE DUE DATES FOR
SENTENCE MEMORANDUMS AND SENTENCE**

Comes now the defendant, by and through undersigned counsel to respectfully move this Court to continue the due dates for sentencing memorandums and sentence.

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 date for the filing of sentence memorandums is this Thursday, July 6, 2023 and sentencing is set for July 13, 2023.
2. Counsel has requested the trial transcripts, but they have not been received. The defendant wishes to review them to most effectively draft his sentence memorandum.
3. Mr. Dreher consents to the granting of this motion
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 July 3,
2023.

/s/ Richard S. Stern

RICHARD S. STERN