

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA** :  
 :  
 **v.** : **Case No. 21–498-CJN**  
 :  
 **ANDREW QUENTIN TAAKE** :  
 :  
 **Defendant** :

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**RESPONSE TO GOVERNMENT’S NOTICE OF POSITION ON STAY  
PENDING APPEAL**

COMES NOW, the Defendant, Andrew Quentin Taake, by and through his counsel, Michael E. Lawlor, Nicholas G. Madiou, and Brennan, McKenna & Lawlor, Chtd., and files this response to the Government’s Notice of Position on Stay Pending Appeal (ECF No. 43):

1. Mr. Taake opposes the Government’s proposal. The Government takes the position that this Court should move forward at this juncture with trial on the counts not at issue in the pending interlocutory appeal. Should this Court proceed in the manner the Government has suggested, Mr. Taake would face the possibility of two separate federal trials, all while detained.

2. The Government’s proposal would result in an unreasonable extension of Mr. Taake’s pretrial detention. The proposal would also needlessly expend the resources of both counsel for Mr. Taake and this Court.

3. Mr. Taake looks forward to amplifying his response to the

Government's position at the October 26, 2022 status conference.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 21, 2022, a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via ECF.

/s/

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Michael E. Lawlor