

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00623 (CRC)

MICHAEL ECKERMAN

JOINT MOTION TO CONTINUE STATUS HEARING

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully move this Court to continue the present scheduled date of March 10, 2022 to April 22, 26 or 27, 2022 if available to the Court.

Attempt to obtain consent

Undersigned counsel contacted Mona Furst, Esquire, counsel for the government, on her position on this matter and she joins in this motion.

As grounds therefore, we state as follows:

1. The status hearing is set in this matter for March 10, 2022.
2. The government and the defendant have been negotiating a plea agreement. Some more investigation and review of discovery needs to be done to finalize the matter and it would not be done by March 10, 2022.
3. Undersigned counsel has discussed with the defendant his right to demand a speedy trial. He understands that he has that right but agrees to this motion to continue, and wishes to exclude the time from this date until the proposed new date

from any speedy trial calculations to review any additional discovery and negotiate a possible resolution.

4. Counsel have agreed to having the next hearing to April 22, 26 or 27, 2022, if available to the Court.

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 March 8, 2022.

*/s/ Richard S. Stern*

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RICHARD S. STERN