

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 April 26, 2022 to a date in May, 2022.

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 April 26, 2022.
2. The government will file a superseding incitement adding a new defendant. The grand jury for that matter is set for April 27, 2022, the day after the presently set status date.
3. Since there would have to be a status with all defendants and counsel present, we submit it would the most efficient use of the court's resources to set a new status hearing for all parties and counsel after April 27<sup>th</sup>.

4. 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 pursuant to the Speedy Trial Act, 18 U.S.C. § 3161 ("Speedy Trial Act") as that best serves the interests and ends of justice and outweighs the interests of the public and Defendant in a speedy trial to allow time to review any additional discovery, hold one hearing for both status and arraignment on the superseding indictment, and negotiate a possible resolution.

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 April 11, 2022.

*/s/ Richard S. Stern*

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RICHARD S. STERN