

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-00623 CRC

MICHAEL ECKERMAN

UNOPPOSED MOTION FOR ADDITIONAL TIME IN WHICH TO FILE RESPONSES
TO THE GOVERNMENT'S MOTIONS IN LIMINE

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully move this Court to grant him leave for an additional time of one (1) week and file our responses on or before October 21, 2022.

Attempt to obtain consent

Undersigned counsel contacted Jessica Arco, Esquire, counsel for the government, on her position on this matter and she does not oppose to the granting of this motion.

As grounds therefore, we state as follows:

1. The undersigned and the government have discussed the motions in limine and expect to agree on several and possibly compromise on the others. We submit it would save the Court's resources and streamline the issues.

2. 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 from this date 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 October 12, 2022.

/s/ Richard S. Stern

RICHARD S. STERN