

Jeffrey D. Kent (California State Bar No.: 162237)

1

THE KENT LAW FIRM, APC

1400 N. Harbor Blvd., Suite 601

```
Fullerton, California 92835
   Off: (714) 401-3827 | Fax: (714) 908-3827
   Email: jdkent@not-quilty.org
 4
   Attorney for Defendant,
5
   Melanie Christine Belger
 6
   Dennis P. Gaughan (California State Bar No. 156355)
   1432 Edinger Ave., Suite 240
   Tustin, California 92783
   Off: (949) 798-9897 | Fax: (714) 258-8282
8
   Email: gaughanlaw@pacbell.net
   Attorney for Defendant,
10
   Michelle Alexandra Etsey
11
                        UNITED STATES DISTRICT COURT
12
                        FOR THE DISTRICT OF COLUMBIA
1.3
   UNITED STATES OF AMERICA,
                                       Case No. 22-mj-207
14
             Plaintiff,
                                       FIRST STIPULATION TO CONTINUE
                                       STATUS HEARING
15
                  v.
                                       OLD STATS HEARING DATE:
16
   MICHELLE ALEXANDRA ETSEY, AND
                                       January 17, 2023
17
   MELANIE CHRISTINE BELGER
                                       NEW STATUS HEARING DATE:
                                       May 23, 2023 at 1:00 p.m.
18
             Defendants.
19
20
2.1
2.2
         IT IS HEREBY STIPULATED AND AGREED by and between defendants
23
   Melanie Christine Belger, and her counsel, Jeffrey D. Kent, Michelle
24
   Alexandra Etsey, and her counsel, Dennis Gaughan, and plaintiff
25
   United States of America, by and through its counsel of record, the
   United States Attorney for the District of Columbia, as follows:
26
              Defendants' status hearing date is currently scheduled for
27
         1.
   January 17, 2023 at 1:00 p.m.
28
```


1	2. B	oth counsel for Ms. I	Belger, and counsel for Mrs. Etsey
2	ne	eed additional time	to go through the voluminous amounts
3	0	f discovery both per	sonally, and with their respective
4	C.	lients.	
5	3. T	he time between Janua	ary 17, 2023 and May 23, 2023 shall be
6	e:	xcluded from calcula	tion of time in the interest of
7	از	ustice under the Spe	edy Trial Act.
8	3.	Accordingly, the par	ties believe it is in the best
9	interest o	f the case for the st	tatus hearing date be continued to May
10	23, 2023 a	t 1:00 p.m.	
11			
12	Dated: Ja:	nuary 12, 2023	/s/Jeffrey D. Kent JEFFREY D. KENT
13			Attorney for Defendant MELANIE CHRISTINE BELGER
14			
15	Dated: Jan	uary 12, 2023	/s/Dennis P Gaughan DENNIS P. GAUGHAN
16			Attorney for Defendant MICHELLE ALEXANDRA ETSEY
17			
18	Dated: Jar	nuary 13, 2023	TRACY L. WILKISON Acting United States Attorney
19			BENJAMIN D. BARRON
20			Assistant United States Attorney Chief, Santa Ana Branch Office
21			Chief, Santa Ana Branch Office
22			/s/ Zachary Phillips ZACHARY PHILLIPS
23			Assistant United States Attorney
24			Attorneys for Plaintiff UNITED STATES OF AMERICA
25			
26			[Digitally signed by JDK pursuant to
27			Email authorization January 12,
28			2023]