

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

**UNITED STATES**

**v.**

**KENNETH JAY BONAWITZ**

**Case No. 23-cr-055-JMC**

**\* \* \* \* \***  
**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE AND  
EXCLUSION OF TIME FROM CALCULATION UNDER THE SPEEDY  
TRIAL ACT**

The Defendant, Kenneth Jay Bonawitz, by and through his attorneys, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court continue the status conference currently set in this case for July 6, 2023 at 10:30 a.m., and exclude certain time from the Speedy Trial Act calculation in this case. In support of this Motion, counsel states the following:

1. A status conference is currently set in this matter for July 6, 2023 at 10:30 a.m. Undersigned counsel respectfully requests that the hearing be continued to another date and time convenient for the Court and counsel for the following reasons:
  - a. The Government has extended Mr. Bonawitz a plea offer. Last week, the undersigned counsel was rushed to the emergency room and diagnosed with pneumonia. Accordingly, the undersigned counsel

requires additional time to discuss the plea offer with Mr. Bonawitz.

The parties are confident that this case can be resolved short of trial.

2. This Motion is unopposed. The undersigned has contacted Assistant United States Attorney Sean McCauley, who has indicated that the United States does not oppose this request.

3. Should the Court grant this Motion, the parties request that Chambers confer with the parties to select a date and time for a further status conference. The parties propose setting the status conference for the second week of August 2023. Should the parties reach a resolution before that date, counsel will contact Chambers to schedule an in-person plea hearing.

4. Mr. Bonawitz consents to the exclusion of time under the Speedy Trial Act from July 6, 2023 to the date of the next status conference.

Wherefore, for the reasons stated in this motion, the undersigned counsel respectfully asks this Court to continue the July 6, 2023 status hearing to a date and time convenient for the Court and counsel in the second week of August, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

---

Michael E. Lawlor  
Brennan, McKenna & Lawlor, Chtd.  
6305 Ivy Lane, Suite 700  
Greenbelt, Maryland 20770  
(301) 474-0044  
mlawlor@verizon.net

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, July 5, 2023, a copy of the foregoing was sent to all parties via ECF.

/s/

---

Michael E. Lawlor