

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

UNITED STATES

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v.

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Case No. 21-cr-00160-TJK

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RYAN ASHLOCK

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**CONSENT MOTION FOR EXTENSION OF TIME TO FILE
SENTENCING MEMORANDUM**

The Defendant, Ryan Ashlock, by and through his attorneys, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., respectfully files this consent motion to extend the time within which the Defendant is to file his memorandum in aid of sentencing. In support of this motion, counsel states as follows:

1. Per prior Order of the Court, undersigned counsel is to file the defendant’s sentencing memorandum on or before November 3, 2022.

2. Undersigned counsel requires a brief extension of time to file the defendant’s sentencing memorandum in this case on or before November 7, 2022. Counsel makes this request as a result of being in back-to-back federal jury trials over the last two months. First, counsel recently appeared in this Court for a six-week jury trial in United States v. Darin Moore, case no: 18-cr-00198 JEB which began on Tuesday, September 13, 2022. Then, counsel appeared in the United States District Court for the District of Maryland in United States v. Darryl Frazer, case

no: 19-cr-0545 PWG which began on Monday October 31, 2022. Undersigned counsel is giving closing arguments in the Frazer trial today.

3. For these reasons, the undersigned counsel respectfully asks for an extension to Monday, November 7, 2022 to file the defendant's sentencing memorandum in this case.

4. Undersigned counsel discussed this request with Assistant United States Attorney Conor Mulroe. At this time, the undersigned is authorized to state that the United States does not oppose this request.

5. For these reasons, undersigned counsel respectfully asks for a brief extension of time to file the defendant's sentencing memorandum such that the defendant's sentencing memorandum will be filed on or before Monday November 7, 2022.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 3, 2022, a copy of the foregoing was electronically filed under seal, with a copy sent to counsel for the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor