

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA *

*

v. *

*

Case No. 21-cr-00213-RJL

CHAD BARRETT JONES *

*

*

Defendant. *

*

**CONSENT MOTION TO CONTINUE PRETRIAL CONFERENCE
AND TRIAL**

The Defendant, Chad Barrett Jones, by and through counsel, William C. Brennan, Jr., Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., hereby moves this Honorable Court to continue the pretrial conference and trial dates in the above-captioned case. In support of this Motion, counsel state as follows:

1. A pretrial conference is currently set in this case for June 13, 2023 at 4:00 p.m. A bench trial is set for June 19, 2023 at 1:00 p.m. These dates were set by the Court, *sua sponte*.

2. At this time, Mr. Jones respectfully requests that this Court continue these proceedings.

3. On June 13, 2023, co-counsel for Mr. Jones, Michael Lawlor, begins a jury trial in the Circuit Court for Montgomery County. *See State v. Jose Oyarce*, No. C-15-CR-22-795. The trial date in that case was set in December 2022. On June 20,

2023, Mr. Lawlor will begin another jury trial in the Circuit Court for Montgomery County in a related matter. *See State v. Jose Oyarce*, No. 138871C.

4. This motion is unopposed. Undersigned counsel contacted counsel for the Government, who have indicated that they consent to the requested continuance.

5. Counsel for the Government are not available until after July 31, 2023. Accordingly, Mr. Jones respectfully proposes conducting the bench trial in this matter during one of the following weeks: the week of August 21, 2023; the week of August 28, 2023; the week of September 18, 2023; or the week of October 9, 2023. If these dates are not available for the Court, counsel for Mr. Jones and the Government are also available in the weeks after October 9. The undersigned respectfully request that the Court set a pretrial conference within these same weeks.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the pretrial conference and bench trial in this case.

Respectfully submitted,

/s/

William C. Brennan, Jr.
Michael E. Lawlor
Brennan, McKenna & Lawlor, Chtd.
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301.474.0044

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 26, 2023, a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via ECF.

/s/

William C. Brennan, Jr.