

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

UNITED STATES :
v. : Crim. No. 21-CR-291-1 (ABJ)
THOMAS F. SIBICK :

CONSENT MOTION TO CONTINUE STATUS HEARING

The defendant, Thomas F. Sibick, through undersigned counsel, Stephen F. Brennwald, Brennwald & Robertson, hereby moves to continue the status hearing set for December 19, 2022.

Undersigned counsel was recently hospitalized as a result of a very serious illness, and following that hospitalization, was recuperating. As a result, he was unable to complete discussions with the government and the defendant regarding the anticipated resolution of this matter.

It appears that the earliest available date for a new status/change of plea hearing is January 27, 2023, at 1:30 p.m. This date is available to the Court and both parties.

The government is aware of the need for a new hearing date given defense counsel's recent medical issues, and does not appear to oppose the relief requested.

In light of the foregoing, Mr. Sibick hereby agrees, pursuant to 18 U.S.C. § 3161 *et seq.*, to exclude from the running of the speedy trial clock the time period between December 19, 2022, and any further status hearing/change of plea date.

WHEREFORE, for the foregoing reasons, as well as for any other reasons that may appear to this Court, the parties ask this Court to vacate the hearing set for Monday, December 19, 2022, to reset the matter to January 27, 2023, at 1:30 p.m., to toll the running of the speedy trial clock until the next hearing date, and for any other relief that is just and proper.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent by ECF, this 14th day of December, 2022, to all counsel of record.

/s/

Stephen F. Brennwald