

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

UNITED STATES OF AMERICA,)
)
v.)
) CRIM NO. 21-CR-411-APM
STEWART PARKS,) Judge: Mehta
)
Defendant.)

**UNOPPOSED MOTION FOR LEAVE TO FILE
MOTION FOR CHANGE OF VENUE OUT OF TIME**

COMES NOW Stewart Parks, through counsel, and requests leave to file his Motion for Change of Venue out of time. As reasons therefor, defendant states as follows:

1. This matter is currently scheduled August 23, 2022. That trial date was set at the most recent status date of July 1, 2022.
2. On July 14, 2022, this honorable court issued an order setting a deadline for counsel to file a Motion for Change of Venue for July 20, 2022.
3. Last week, undersigned counsel has had the personal misfortune of contracting COVID and has been confined to his home to recover. Counsel was unable to finalize his motion due to his sickness, and, while not at full strength, has only been able to finalize his motion at this time.

WHEREFORE, Mr. Parks requests that the court grant leave to permit the filing of the Motion for Change of Venue.

Respectfully submitted,

STEWART PARKS

By Counsel

/s/ John L. Machado

John L. Machado, Esq.

Bar. No. 449961

Counsel for Stewart Parks

503 D Street, N.W., Suite 310

Washington, DC 20001

Phone: (703) 989-0840

E-mail: johnlmachado@gmail.com

Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 29th day of July, 2022, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado

John L. Machado, Esq.

Bar Number 449961

Attorney for Stewart Parks

Law Office of John Machado

503 D Street NW, Suite 310

Washington, D.C. 20001

Telephone (703)989-0840

Email: johnlmachado@gmail.com