

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

UNITED STATES OF AMERICA,

-v-

KENNETH JOSEPH OWEN THOMAS,

Defendant.

Criminal No.: 21-cr-00552 (DLF)

**DEFENDANT THOMAS'S CONSENT
MOTION FOR EXTENSION OF TIME TO
FILE PRETRIAL MOTIONS**

Defendant Kenneth Joseph Owen Thomas, with the United States' consent, hereby moves for a extension of time for Defendant Kenneth Joseph Owen Thomas to file his pretrial motions.

The current reply deadline is February 2, 2023.

1. Counsel for Defendant Kenneth Joseph Owen Thomas is currently preparing various pretrial motions. However, Counsel only just received various video discovery, and therefore requires additional time to review these videos to determine appropriate actions to take. Defendant Thomas therefore seeks a revised motions schedule to file any pretrial motions.
2. United States has proposed the following revised motions schedule.
 - Motion deadline: Feb. 16
 - Response deadline: March 2
 - Replies deadline: March 9

WHEREFORE, Defendant Kenneth Joseph Owen Thomas respectfully requests that the Court revise and extend the current pretrial motions schedule. The United States consents to this request.

Date: February 2, 2023

Respectfully Submitted,

/s/ John M. Pierce

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Attorney for Defendant

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, February 02, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce