

**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 16, 2023.

1. Counsel for Defendant Kenneth Joseph Owen Thomas is currently preparing various pretrial motions. However, Counsel has been ill, and therefore requires additional time to finish preparation of these motions. Defendant Thomas therefore seeks a revised motions schedule to file any pretrial motions.
2. Defendant's propose the following revised motions schedule.
 - Motion deadline: Feb. 23
 - Response deadline: March 9
 - Replies deadline: March 16

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 16, 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