

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

UNITED STATES

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v.

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Case No. 21-cr-00553-TFH

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THOMAS JOHN BALLARD

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**CONSENT MOTION TO CONTINUE STATUS CONFERENCE AND
EXCLUSION OF TIME FROM CALCULATION UNDER THE SPEEDY
TRIAL ACT**

The Defendant, Thomas John Ballard, by and through his attorneys, Michael E. Lawlor, Nicholas G. Madiou, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court continue the status conference currently scheduled in this case on March 7, 2023 and exclude certain time from the Speedy Trial Act calculation in this case. In support of this Motion, counsel states the following:

1. A status conference is presently scheduled in this matter on March 7, 2023. Undersigned counsel respectfully requests a continuance of this hearing by approximately 30 days for the following reason:

- a. The parties are engaged in active plea negotiations, and the Government has extended a written plea offer to Mr. Ballard. Counsel requires some additional time to meet with Mr. Ballard, who is incarcerated, to discuss

review the offer. The parties are confident that this case will resolve short of trial.

2. This motion is unopposed. Undersigned counsel has discussed this request with Assistant United States Attorney, Zachary Phillips, who authorized counsel to state that the United States consents to the continuance of the status hearing in this matter.

3. Mr. Ballard consents to the tolling of the speedy trial clock for an additional 30 days.

Wherefore, for the reasons stated in this motion, undersigned respectfully asks this Court to continue the current status conference by approximately 30 days to a date convenient to the Court and all parties, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, March 6, 2023, a copy of the foregoing was sent to all parties via ECF.

/s/

Michael E. Lawlor