

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

\*

vs.

\* Case No.: 21-cr-553 TFH

THOMAS JOHN BALLARD

\*

Defendant

\*

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

COMES NOW, the Defendant, Thomas John Ballard, by and through counsel, Michael E. Lawlor, Esq., Nicholas G. Madiou, Esq. and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status hearing currently scheduled for Thursday, April 13, 2023 at 4:30 p.m., and exclude certain time from the Speedy Trial Act calculation in this case. In support of this Motion, counsel states the following:

1. Per prior Order of the Court, Mr. Ballard is scheduled to appear before this Honorable Court on Thursday, April 13, 2023 at 4:30 p.m. for a status hearing in the above-referenced case.
2. Undersigned counsel respectfully asks that the status hearing scheduled for Thursday, April 13, 2023 be vacated and that this case be set in for a rearraignment hearing.
3. The parties have reached a plea agreement in this matter, and a signed plea agreement will be sent to Chambers as soon as possible.

4. Counsel asks that the status hearing scheduled for Thursday, April 13, 2023 be vacated and that this case be set in for a arraignment hearing on a date convenient to this Court and the parties.

5. Undersigned counsel has discussed this request with Mr. Ballard, and is authorized to state that she agrees with the instant request, and consents to exclusion of time under the Speedy Trial Act.

6. Undersigned counsel has also contacted Assistant United States Attorney Barry Disney, and is authorized to state that the United States does not oppose this motion.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court to;

- A. Vacate the status hearing scheduled for Thursday, April 13, 2023;
- B. Set this matter in for a arraignment hearing on a date convenient to the Court and the parties; and
- C. Exclude the time between April 13, 2023 and the date of the arraignment hearing from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

April 12, 2023

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 12, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

*/s/*

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Michael E. Lawlor