

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

THOMAS JOHN BALLARD,

Defendant.

:
:
:
:
:
:
:
:
:
:
:

Case No.: 21-cr-00553 (RJL)

JOINT MOTION TO CONTINUE PLEA HEARING DATE

The United States of America, by and through Assistant United States Attorneys Zachary Phillips and Barry Disney, and Defendant Thomas John Ballard, by and through his counsel Michael E. Lawlor and Nicholas George Madiou, move this Court for an approximately one-week continuance of Mr. Ballard’s plea hearing, currently scheduled for May 16, 2023 at 4:00 p.m. The parties hereby stipulate and agree that:

1. A plea hearing is presently set for May 16, 2023, at 4:00 p.m.
2. In preparation for the plea hearing the parties were informed that the statement of facts must be prepared by the defendant. In addition, a typographical error was discovered in the plea paperwork.
3. The Government and defense counsel have spoken and are in the process of correcting the plea paperwork. In addition, defense counsel is preparing a statement of facts to be reviewed by and approved by the parties prior to the plea hearing.
4. The Government and defense believe that the parties can be prepared for the plea hearing the week of May 22, 2023. Counsel for the defendant and the Government are available

anytime May 22, 23, 24 or 25 for a plea hearing subject to the Court's approval and availability.

5. Counsel for the defendant and Government consent to exclusion of time under the Speedy Trial Act.

For these reasons, the parties hereby move and stipulate that the Court should continue Mr. Ballard's plea sentencing date from May 16, 2023, at 4:00 p.m. to a date convenient during the week of May 22, 2023.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Zachary Phillips
ZACHARY PHILLIPS
Assistant United States Attorney
CO Bar No.31251
United States Attorney's Office, Detailee
1801 California Street, Suite 1600
Denver, CO 80202
Telephone: (720) 281-1611
Zachary.phillips@usdoj.gov