

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 21–553-RJL**
 :
THOMAS JOHN BALLARD :
 :
Defendant :

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

The Defendant, Thomas John Ballard, by and through counsel, Michael E. Lawlor, and Nicholas G. Madiou, Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the plea hearing currently scheduled for June 2, 2023 and exclude that time from the Speedy Trial calculation in this case. In support of this motion, counsel states the following:

1. Per prior Order of the Court, a plea agreement hearing is currently scheduled for June 2, 2023 at 4 p.m. This Court further Ordered the parties to submit updated plea paperwork to Chambers on or before May 26, 2023. Undersigned counsel respectfully files this motion to continue the Status Conference currently scheduled for the following reasons.

2. The parties are in the process of completing the updated plea paperwork in this case, and require a brief continuance to do so. Once the completed plea

paperwork is complete and executed, the parties will submit those documents to this Honorable Court.

3. The parties respectfully request that the plea agreement hearing currently scheduled for June 2, 2023 be continued for a period of approximately two weeks.

4. Undersigned counsel discussed this request with counsel for the Government, Zachary Phillips, Esq., and is authorized to state that the United States consents to this motion to continue.

5. For these reasons, counsel respectfully asks this Court to continue the current plea agreement hearing scheduled for June 2, 2023 for approximately 14 days 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 May 30, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor