

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

*

vs.

* Case No.: 21-mj-00568 ZMF

COLE ANDREW TEMPLE

*

Defendant

*

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

COMES NOW, the Defendant Cole Andrew Temple, by and through counsel, Michael E. Lawlor, and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for Tuesday, June 7, 2022, 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. Temple is scheduled to appear before this Honorable Court on Tuesday, June 7, 2022 at 1:00 p.m. for a status conference in the above-referenced case.

2. Undersigned counsel respectfully asks for a 30-day continuance of the status conference, and the exclusion of that time for Speedy Trial purposes, for the following reasons.

a. Undersigned counsel is requesting additional time to review discovery with the defendant and discuss a possible resolution in this case.

3. Undersigned counsel discussed this request with Mr. Temple, and is authorized to state that he is in agreement with the instant request, and consents to exclusion of time under the Speedy Trial Act.

4. Undersigned counsel also attempted to contact Assistant United States Attorney Anita Eve, regarding her position on this request but have not received a response.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the current status conference date for a period of approximately 30 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 June 3, 2022, 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