

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

UNITED STATES OF AMERICA

*

vs.

* **Case No.: 22-cr-00067 CJN**

JOSHUA JOHN PORTLOCK

*

Defendant

*

**CONSENT MOTION FOR CONTINUANCE AND EXCLUSION OF TIME
FROM CALCULATION UNDER THE SPEEDY TRIAL ACT**

COMES NOW, the Defendant Joshua John Portlock, by and through counsel, Michael E. Lawlor and Nicholas G. Madiou and, Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for Friday, January 27, 2023 at 11:00 a.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. Portlock is scheduled to appear before this Honorable Court on Friday, January 27, 2023 at 11:00 a.m. for a status conference.

2. For the following reasons, undersigned counsel respectfully asks for a 60-day continuance of the status conference, and the exclusion of that time for Speedy Trial purposes, for the following reasons:

- a. The discovery in this matter is voluminous and counsel is requesting additional time to review the discovery in its entirety and discuss the case with the defendant.
- b. Additionally, undersigned counsel seeks additional time to engage in plea negotiations with the Government in order to try and reach a resolution in this case.

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

4. Undersigned counsel has also contacted Assistant United States Attorney Elizabeth Eriksen, and is authorized to state that the United States consents to the relief sought in this motion.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the current status conference date for a period of approximately 60 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 January 20, 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