

**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 Thursday, March 30, 2023, 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 Thursday, March 30, 2023 at 3:30p.m. for a status conference.

2. For the following reasons, 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 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 30 days, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

Michael E. Lawlor
Nicholas G. Madiou
Brennan, McKenna & Lawlor, Chtd.
6305 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
301.474.0044
mlawlor@verizon.net
nmadiou@brennanmckenna.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 15, 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