

**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 TO CONTINUE PLEA HEARING**

COMES NOW, the Defendant, Joshua John Portlock, by and through counsel Michael E. Lawlor, Nicholas G. Madiou, and Brennan, McKenna & Lawlor, Chtd., and hereby moves this Honorable Court to continue the plea hearing currently scheduled for Thursday, July 20, 2023 at 1:00 p.m. In support of this Motion counsel state the following:

1. The Defendant is scheduled to appear before this Honorable Court on Thursday, July 20, 2023 at 1:00 p.m. for a plea hearing.

2. The Defendant respectfully asks this Court to continue the current plea hearing for the following reasons:

- a. Counsel requires a continuance of the plea hearing because counsel Michael E. Lawlor is currently scheduled to be in trial in the matter of *United States v. Chad B. Jones*, case no.: 21-213 RJL beginning on Monday, July 17, 2023 through Friday, July 20, 2023.

b. Additionally, counsel Nicholas G. Madiou is scheduled to be in a murder trial in the Circuit Court for Prince George's County in the matter of *State of Maryland v. Fabian S. Tinsley*, case no.: CT210412D beginning on Monday, July 17, 2023 through Thursday, July 27, 2023.

3. This motion is unopposed. Undersigned counsel contacted Assistant United States Attorney Elizabeth Ericksen, and is authorized to state that the United States **consents** this request.

4. Mr. Portlock agrees to toll the speedy trial clock until the next hearing.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the current plea hearing now scheduled for Thursday, July 20, 2023 at 1:00 p.m. to a date that is convenient to the Court and all parties.

Respectfully submitted,

Brennan, McKenna & Lawlor, Chtd.

/s/

---

Michael E. Lawlor - Bar Number 459767  
Nicholas G. Madiou - Bar Number MD0039  
6305 Ivy Lane, Suite 700  
Greenbelt, Maryland 20770  
301.474.0044  
[mlawlor@verizon.net.com](mailto:mlawlor@verizon.net.com)  
[nmadiou@brennanmckenna.com](mailto:nmadiou@brennanmckenna.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 14, 2023, a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via email.

/s/

---

Michael E. Lawlor, Esquire