

**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 27, 2023 at 2:00 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 27, 2023 at 2:00 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 Mr. Portlock had surgery on a broken foot late last week. Mr. Portlock has been placed in a knee scooter and is unable to travel to the District of Columbia and attend the scheduled plea hearing due to a lack of mobility.

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 27, 2023 at 2:00 p.m. to a date that is convenient to the Court and all parties.

Respectfully submitted,

Brennan, McKenna & Lawlor, Chtd.

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 24, 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