

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

*

vs.

* Case No.: 22-mj-00112 RMM

RODNEY MILSTREED

*

Defendant

*

CONSENT MOTION TO EXTEND TIME TO FILE RESPONSE

COMES NOW the Defendant, Rodney Milstreed, by and through his attorneys, Michael E. Lawlor, Esq., and Brennan, McKenna & Lawlor, Chtd., and respectfully files this consent motion to extend the time within which the Defendant is to file his response to the Government’s Motion for Review and Appeal of Release Order. In support of this motion, counsel states as follows:

1. Per prior Order of the Court, undersigned counsel is to file a response to the Government’s Motion for Review and Appeal of Release Order on or before May 31, 2022.

2. Undersigned counsel requires a brief extension of time to file the response in this case because counsel was just appointed to retain the defendant in this matter. Additionally, counsel is scheduled to begin a carryover murder trial in the Circuit Court for Prince George’s County, Maryland in the matter of *State of Maryland v. Josue Vasquez*, case no.: CT180183X on Monday, June 6, 2022 through Friday June 10, 2022. Counsel is requesting additional time to prepare and file the response in this matter.

3. For these reasons, the undersigned counsel respectfully asks for a brief extension by approximately 30 days to file its response to the Government's Motion for Review and Appeal of Release Order.

4. Undersigned counsel discussed this request with Assistant United States Attorney Emily W. Allen. At this time, the undersigned is authorized to state that the United States consents to a brief extension of time to file response.

5. For these reasons, undersigned counsel respectfully asks for a brief extension of time to file its response to the Government's Motion for Review and Appeal of Release Order, such that the Defendant's response will be filed on or before July 1, 2022 or a date as ordered by the Court.

Respectfully submitted,

/s/

June 1, 2022

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 1, 2022, a copy of the foregoing was electronically filed under seal, with a copy sent to counsel for the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor, Esq.