

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

*

VS.

* Case No. 1:22-cr-00171 JMC

PAULA CONLON, et al

*

**CONSENT MOTION TO CONTINUE
ARRAIGNMENT AND STATUS HEARING**

The Defendant, by and through her attorney, Robert C. Bonsib, Esq., respectfully requests this Honorable Court to rescheduled the arraignment and status hearing in the above matter and, as reasons therefore, states as follows:

1. The above matter is presently scheduled for an arraignment and status hearing for Tuesday, June 7, 2022 at 2 pm. Undersigned counsel is presently scheduled to begin on June 6, 2022 a 4-5 days jury trial in the Circuit Court for Montgomery County in the matter of *State of Maryland v Noe Surriel*. Based upon the conflict with counsel's trial schedule, undersigned counsel is respectfully requesting that this Honorable Court reschedule the arraignment and status hearing to a later date.

2. Undersigned counsel has discussed this request with Assistant United States Attorney Mona Lee Furst who has authorized undersigned counsel to represent that the government consents to this request. The government and undersigned counsel have consulted and are both available on the morning of June 22 and early afternoon (government counsel has another matter at 3 pm); June 23, or June 24 after 1 pm. Assistant Federal Public Defender Eugene Ohm, Counsel for the co-defendant Stacy Lee Bond, was contacted re scheduling and he advised that his appearance in this matter was limited to Mr. Bond's initial appearance and that

counsel has not yet been assigned to Mr. Bond so the availability of co-defendant counsel for the suggested dates is unknown.

WHEREFORE, it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

/s/ Robert C. Bonsib

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent, via ECF, this 31st day of May, 2022 to counsel of record.

/s/ Robert C. Bonsib

ROBERT C. BONSIB