

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**UNITED STATES OF AMERICA,**

**-v-**

**NANCY BARRON,**

Defendant.

Case No. 1:22-cr-00089-APM-1

DEFENDANT'S MOTION FOR  
ENLARGEMENT OF TIME

**DEFENDANTS UNOPPOSED MOTION FOR ENLARGMENT OF TIME  
AND CONSENT TO MAGISTRATE JUDGE**

COMES NOW, the Defendant, Nancy Barron, by and through undersigned counsel, with this Notice and Waiver, hereby consents to trial by Magistrate Judge and respectfully moves the Court to grant a continuance for trial, which is currently set on June 5, 2023. Counsel respectfully requests a continuance for trial due to the hectic trial schedule of both Counsel and his partner, Roger Roots. Furthermore, Counsel has another trial that same week on June 12, 2023, as well a felony trial on May 15, 2023, which would essentially equate to three trials in one month for Counsel. Thus, in order to be adequately prepared and in the best interests of the client, a continuance to the current June 5<sup>th</sup> trial date should be granted. Counsel has conferred with the Government, who has agreed to join in this continuance request. No harm will come to either party, the

Defendant will not oppose tolling timing, and consents to a waiver to exclude the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161.

Furthermore, included in Defendant's motion is also this request and waiver to the Court to proceed to trial by U.S. Magistrate Judge. Nancy Barron was charged with violations of 18 U.S.C. § 1752(a) (1) and (2) and with 40 U.S.C. § 5104(e)(2)(D) and (G) through the criminal complaint that was filed on March 11, 2022. Yet pursuant to 18 U.S.C. § 3401, a Defendant that is charged with only misdemeanors may elect to expressly waive trial, judgment, and sentencing by a district judge and/or jury and does so either in writing or by oral motion on the record. Therefore, notice is hereby given that Defendant Nancy Barron waives her right to a trial, judgment, and sentencing by a district court judge and hereby elects to proceed to trial by a magistrate judge for the District of Columbia. Counsel has conferred with the Government, which takes no position on the request to proceed before a magistrate judge.

WHEREFORE, the Defendant respectfully moves the Court, with the consent of the Government, to grant Defendant's continuance of trial.

Dated: May 2, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

21550 Oxnard Street

3rd Floor, PMB #172

Woodland Hills, CA 91367

Tel: (213) 400-0725

Email: [jpierce@johnpiercelaw.com](mailto:jpierce@johnpiercelaw.com)

*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I, John M. Pierce, hereby certify that on this day, May 2, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

*/s/ John M. Pierce* \_\_\_\_\_

John M. Pierce