

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

\*

vs.

\* Case No.: 22-cr-00299 CKK

SHAWNDALE CHILCOAT

\*

Defendant

\*

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**UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE AND  
EXCLUSION OF TIME FROM CALCULATION UNDER THE SPEEDY  
TRIAL ACT**

The Defendant, Shawndale Chilcoat, by and through counsel, Michael E. Lawlor, and Nicholas G. Madiou, Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for July 3, 2023 and exclude this time from the Speedy Trial Act calculation in this case. In support of this motion, counsel states the following:

1. This Court has scheduled a Status Conference on July 3, 2023, at 1:00 p.m. Undersigned counsel respectfully files this motion to continue the Status Conference currently scheduled for the following reasons:

a. Undersigned counsel was informed this morning that the defendant had an unexpected death in the family.

2. Undersigned counsel discussed this request with counsel for the Government, Ashley Akers, Esq., and is authorized to state that the United States consents to this motion to continue.

3. Undersigned counsel discussed this request with Maria Jacob, Esq., counsel for co-defendant, Donald Chilcoat, and is authorized to state that the co-defendant's counsel consents to this motion to continue.

4. For these reasons, counsel respectfully asks this Court to continue the current Status Conference scheduled for July 3, 2023 to a date within 14 days that is convenient to the Court and all parties and exclude this time from the Speedy Trial Act calculation in this case.

Respectfully submitted,

/s/

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 3, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

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Michael E. Lawlor