

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

*

vs.

*

Case No.: 22-cr-00338 DLF

TRACI ISAACS

*

Defendant

*

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

COMES NOW, the Defendant, Traci Issacs, by and through counsel, Michael E. Lawlor, Esq., Nicholas G. Madiou, Esq. and Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status hearing currently scheduled for Tuesday, March 21, 2023 at 11:30 a.m., and exclude certain time from the Speedy Trial Act calculation in this case. In support of this Motion, counsel states the following:

1. Per prior Order of the Court, Ms. Isaacs is scheduled to appear before this Honorable Court on Tuesday, March 21, 2023 and 11:30m a.m. for a status hearing in the above-referenced case.

2. Undersigned counsel respectfully asks that the status hearing scheduled for Tuesday, March 21, 2023 be vacated and that this case be set in for a rearrangement hearing.

3. The parties have reached a plea agreement in this matter and the signed plea has been sent to Chambers.

4. Counsel asks that the status hearing scheduled for Tuesday, March 21, 2023 be vacated and that this case be set in for a rearrangement hearing on Friday, April 21, 2023. This proposed date has been precleared with Chambers and the parties.

5. Undersigned counsel has discussed this request with Ms. Isaacs, and is authorized to state that she agrees with the instant request, and consents to exclusion of time under the Speedy Trial Act.

6. Undersigned counsel has also contacted Assistant United States Attorney Samuel S. Dalke, and is authorized to state that the United States does not oppose this motion.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court to;

- A. Vacate the status hearing scheduled for Tuesday, March 21, 2023;
- B. Set this matter in for a rearrangement hearing on Friday, April 21, 2023; and
- C. Exclude the time between March 21, 2023 and April 21 2023 from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

March 16, 2023

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 16, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor