

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

UNITED STATES

v.

KENNETH JAY BONAWITZ

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Case No. 23-cr-055-JMC

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UNOPPOSED MOTION TO CONTINUE DETENTION HEARING

The Defendant, Kenneth Jay Bonawitz, by and through his attorneys, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court continue the detention hearing currently set in this case for Monday, March 27, 2023 at 2:00 p.m. In support of this Motion, counsel states the following:

1. A detention hearing is set in this matter before United States Magistrate Judge Robin M. Meriweather for 2:00 p.m. on Monday, March 27, 2023. Undersigned counsel respectfully requests that the hearing be continued to another date and time convenient for the Court and counsel later this week for the following reasons:

- a. On March 27, 2023 at 2:00 p.m., the undersigned is scheduled to appear in-person for a proceeding in the United States District Court for the District of Maryland. *See United States v. Cherubin*, No. TDC-16-319 (D. Md.).

b. The undersigned met with Mr. Bonawitz yesterday at the Correctional Treatment Facility. This meeting had been delayed by Mr. Bonawitz's COVID-19 diagnosis. The undersigned counsel is in contact with Mr. Bonawitz's family members and requires additional time to prepare a pretrial release plan to present to the Court.

2. This Motion is unopposed. The undersigned has contacted Assistant United States Attorney Sean McCauley, who has indicated that the United States does not oppose this request.

3. Should the Court grant this Motion, undersigned requests that Chambers confer with the parties before setting a new date so that undersigned can ensure that a release plan is in place at the time of the rescheduled hearing. .

Wherefore, for the reasons stated in this motion, the undersigned counsel respectfully asks this Court to continue the detention hearing to a date later this week to be cleared with the Court and counsel.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, March 27, 2023, a copy of the foregoing was sent to all parties via ECF.

/s/

Michael E. Lawlor