

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

UNITED STATES

v.

KENNETH JAY BONAWITZ

Case No. 23-cr-055-JMC

* * * * *

JOINT MOTION TO CONTINUE STATUS CONFERENCE

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 status conference currently set in this case for May 25, 2023 at 2:00 p.m. In support of this Motion, counsel states the following:

1. A Zoom status conference is currently set in this matter for May 25, 2023 at 2:00 p.m. Undersigned counsel respectfully requests that the hearing be continued to another date and time convenient for the Court and counsel for the following reasons:

a. The parties have conferred and anticipate that the Government will be extending a plea offer to Mr. Bonawitz within the next two weeks. The undersigned counsel requires time to review the forthcoming plea offer and discuss it with Mr. Bonawitz. The parties are confident that this matter can be resolved short of trial.

2. This Motion is unopposed. The undersigned has contacted Assistant

United States Attorney Sean McCauley, who has indicated that the United States joins in this request.

3. Should the Court grant this Motion, the parties request that Chambers confer with the parties to select a date and time for a further Zoom status. The parties propose setting the status for July 5, 6, or 7, 2023. Should the parties reach a resolution before that date, counsel will contact Chambers to schedule an in-person plea hearing.

Wherefore, for the reasons stated in this motion, the undersigned counsel respectfully asks this Court to continue the May 25, 2023 status hearing for a date and time convenient for the Court and counsel in early July.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, May 2, 2023, a copy of the foregoing was sent to all parties via ECF.

/s/

Michael E. Lawlor