

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

UNITED STATES OF AMERICA

*

vs.

* **Case No.: 21-cr-00190 DLF**

ZACHARY JORDAN ALAM

*

Defendant

*

**CONSENT MOTION FOR CONTINUANCE AND EXCLUSION OF TIME
FROM CALCULATION UNDER THE SPEEDY TRIAL ACT**

COMES NOW, the Defendant Zachary Jordan Alam, by and through counsel, Michael E. Lawlor and Nicholas G. Madiou and, Brennan, McKenna, & Lawlor, Chtd., and hereby moves this Honorable Court to continue the status conference currently scheduled for Tuesday, May 17, 2022 at 2:00 p.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, the Mr. Alam is scheduled to appear before this Honorable Court on Tuesday, May 17, 2022 at 2:00 p.m. for a status conference.
2. For the following reasons, undersigned counsel respectfully asks for an approximately 30-day continuance of the status conference, and the exclusion of that time for Speedy Trial purposes, for the following reasons.

- a. Undersigned counsel is currently in a carryover over murder trial in the matter of *State of Maryland v. Leonard Toney*, case no.:

CT200412B in the Circuit Court for Prince George's County. Trial in this matter began on Monday, May 16, 2022.

3. Undersigned counsel has discussed this request with Mr. Alam, and is authorized to state that he is in agreement with the instant request, and consents to exclusion of time under the Speedy Trial Act.

4. Undersigned counsel has also contacted Assistant United States Attorney Cindy Jane Cho, 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 continue the current status conference date for a period of approximately 30 days, and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

Michael E. Lawlor
Nicholas G. Madiou
Brennan, McKenna & Lawlor, Chtd.
6305 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
301.474.0044
mlawlor@verizon.net
nmadiou@brennanmckenna.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 17, 2022, 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