

6. The granting of this Motion is in the interest of justice, this defendant and does not work an undue burden on the United States Government.

WHEREFORE, PREMISES CONSIDERED, undersigned counsel respectfully requests this Honorable Court entertain this Motion and thereafter enter an order continuing this matter for a status conference for at least thirty days.

Respectfully submitted,

/s/ Thomas J. Spina
Thomas J. Spina
Attorney for Defendant
State Bar #4959-N77T
1330 21st Way South, Suite 200
Birmingham, Alabama 35205
(205) 939-1330
tommy@tommyspina.com

OF COUNSEL

Edward B. MacMahon, Jr.
2600 Pennsylvania Avenue NW, Suite 6A
Washington, DC 20007
(202) 775-1307
ebmjr@macmahon-law.com

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of records.

/s/ Thomas J. Spina
Thomas J. Spina