

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE**

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Docket No. 2:22-CR-76
	)	JUDGE GREER
CHAD BRANDON THOMAS	)	
	)	
Defendant.	)	

MOTION TO CONTINUE ALL DEADLINES

Comes now your Defendant, by and through counsel, and brings forth this Motion to Continue All Deadlines and a request would show as follows:

1. On or about April 11, 2023 the Defendant was appointed the undersigned as new counsel.
2. That soon thereafter the undersigned was made aware of such appointment and immediately began to gather information by speaking with the AUSA and prior counsel.
3. Given the fragile nature of what is pending before the Court, having nothing to do with the undersigned, it is paramount that a continuance of all deadlines be granted in order to allow counsel to familiarize herself with the case and have the opportunity to build a rapport with the Defendant.
4. Currently, a decision is set to be made by May 10, 2023 on the Defendant's Motion to Withdraw his plea agreement.

5. The undersigned states that though she has been able to meet with the Defendant one time, she is still gathering discovery documents that are pertinent to the Defendant's decision to move forward.
6. The undersigned states that there is no possible way with the time constraints given and where the Defendant is housed, that she would be able to make those travels and discussions while she is still not in full possession of the documents to give guidance to the Defendant as required before May 10, 2023.
7. Counsel for the Defendant has discussed this issue with the AUSA and he is unopposed to this motion.

WHEREFORE, the Defendant prays that all deadlines be continued a minimum of sixty (60) days to afford counsel the opportunity to fully investigate the case and to advise the Defendant accordingly. This request is not made to delay proceedings unnecessarily, but to afford zealous representation to meet the interest of justice.

Respectfully submitted, this the 5th day of May, 2023.

Defendant Chad Brandon Thomas

s/ Donna M. Bolton

Donna M. Bolton, BPR # 026349

200 West Unaka Avenue

Johnson City, TN 37604

Phone: 423-631-0077

Fax: 423-631-0944

boltonlaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May, 2023, the foregoing document was filed electronically. Notice of this filing is sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Donna M. Bolton
Donna M. Bolton