



sought. Local Rule 7.1(e) ordinarily would afford Mr. Barton with 21 days to respond, but he anticipates filing a response within the next ten (10) days. In the meantime, Mr. Barton respectfully asks the Court to regard the Government's Motion as not unopposed or consented to by Defendant Timothy Barton, allow Mr. Barton an opportunity to respond as permitted by Local Rule, and to withdraw the Court's ECF Minute Entry [ECF No. 45] granting the Motion

Dated: November 3, 2022

Respectfully submitted,

By: /s/ Michael J. Edney

Michael J. Edney

Virginia Bar No. 48253

DC Bar No. 492024 (*Admitted to NDTX*)

[medney@huntonak.com](mailto:medney@huntonak.com)

Sean B. O'Connell

State Bar No. 24103142 (*application for admission forthcoming*)

[soconnell@huntonak.com](mailto:soconnell@huntonak.com)

Michael Dingman

Virginia Bar No. 95762

DC Bar No. 90001474 (*Admitted Pro Hac Vice*)

[mdingman@huntonak.com](mailto:mdingman@huntonak.com)

**HUNTON ANDREWS KURTH LLP**

2200 Pennsylvania Avenue NW

Washington, DC 20037

Phone: (202) 955-1500

Facsimile: (202) 778-2201

Ted A. Huffman

State Bar No. 24089015

[thuffman@huntonak.com](mailto:thuffman@huntonak.com)

**HUNTON ANDREWS KURTH LLP**

1445 Ross Avenue, Suite 3700

Dallas, Texas 75202

Phone: (214) 979-3000

Facsimile: (214) 740-7110

- and -

Richard Roper  
State Bar No. 17233700  
[richard.roper@hklaw.com](mailto:richard.roper@hklaw.com)  
Javan Porter  
State Bar No. 24116912  
[javan.porter@hklaw.com](mailto:javan.porter@hklaw.com)  
**HOLLAND & KNIGHT LLP**  
1722 Routh Street, Suite 1500  
Dallas, Texas 75201  
Phone: (214) 969-1345  
Facsimile: (214) 999-9252

**COUNSEL FOR TIMOTHY LYNCH BARTON**

**CERTIFICATE OF SERVICE**

On November 3, 2022 I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Michael J. Edney  
Michael J. Edney