

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :  
 :  
vs. : No.  
 :  
 :

DEFENDANT'S MOTION FOR DOWNWARD DEPARTURE

Comes now the defendant, by and through his undersigned counsel, pursuant to LCrR16.1, and certifies that he is filing certain discovery motions contemporaneously with this statement. Defendant's counsel has not yet reviewed the file of the government because the Assistant United States Attorney has informed defense counsel that there is nothing in the government's file, other than the arrest warrant and supporting affidavit, and that there likely will be no other items in the government file until after the motion deadline of [REDACTED]. Therefore, defense counsel is filing the discovery motions, and also is filing a motion requesting leave to file additional motions, if necessary, after the government's file becomes substantially complete.

Respectfully submitted, this day of , [REDACTED].

[REDACTED]

North Carolina State Bar # [REDACTED]  
101 S. Elm Street, Suite 210  
Greensboro, NC 27401  
(336) 333-5455

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing on the below-mentioned attorney by mailing a copy of the same to the following address:

Assistant United States Attorney  
P. O. Box 1858  
Greensboro, NC 27402

This, the day of , [REDACTED].

[REDACTED]