

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

UNITED STATES OF AMERICA :  
 : No. 1:  
v. :  
 :  
 :  
 :

REQUEST FOR EXTENSION OF TIME IN WHICH TO FILE MOTIONS

The defendant, through counsel, hereby requests that the Court extend by seven days the deadline for filing pretrial motions in this case. In support of this request, counsel for the defendant states as follows:

1. The Office of the Federal Public Defender was appointed to represent the defendant on date.

2. The defendant was arraigned on date, and the defendant's case was assigned to a scheduling order filed date, which established date, as the deadline for filing pretrial motions, with a motion hearing date of date.

3. Defense counsel has reviewed the materials contained in the prosecution discovery file. However, additional investigation and research is required in order to make a final determination of the merits of any potential pretrial motions. Defense counsel will be out of town the entire week of June 9, 2003, to attend a Federal Public Defender seminar in Portland, Oregon, followed by annual leave the remainder of the week, and

will not be able to complete the needed investigation and research until after his return.

4. Counsel for the defendant has contacted Assistant United States Attorney Arnold L. Husser, who advises that the government does not oppose the granting of this motion.

The defendant, through counsel, submits that the ends of justice would be served by granting this extension, and that those ends outweigh the interest of the public and the defendant in a speedy trial. Accordingly, the delay occasioned by granting this request should be excluded in computing the time within which the trial in this case should commence. 18 U.S.C. §§ 3161(h)(1)(F) and (h)(8)(A).

For all these reasons, the defendant requests that the deadline for filing pretrial motions in this case be extended until date.

Respectfully submitted this the \_\_\_\_\_ day of June, 2003.

LOUIS C. ALLEN III  
Federal Public Defender

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ERIC D. PLACKE  
Assistant Federal Public Defender  
Arkansas State Bar No. [REDACTED]  
North Carolina State Bar No. [REDACTED]  
101 S. Elm Street, Suite 210  
Greensboro, NC 27401  
(336) 333-5455



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request for Extension of Time in Which to File Motions was served upon Mr. Arnold L. Husser, Assistant United States Attorney for the Middle District of North Carolina, P. O. Box 1858, Greensboro, North Carolina 27402, by hand-delivering a copy of the same.

This the \_\_\_\_ day of June, 2003.

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ERIC D. PLACKE  
Assistant Federal Public Defender

