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4 Attorney for:
Defendant MARIO JUAREZ-RAMIREZ
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6

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 UNITED STATES OF AMERICA,
10

11 Plaintiff,

12 vs.

13 MARIO JUAREZ-RAMIREZ,

14 Defendant.

No. CR06-01124-TUC-CKJ(JJM)

(AMENDED)

**SECOND MOTION TO CONTINUE
TRIAL DATE AND OTHER RELATED
DATES AND DEADLINES**

(By Defendant)

15
16 Defendant MARIO JUAREZ-RAMIREZ, through undersigned
17 counsel, moves the Court to vacate the trial date in this case that
18 is currently set for **October 24, 2006**, as well as all other related
19 dates and deadlines, including the Plea Deadline date, pursuant to 18
20 U.S.C. §3161(h)(8)(A) and (B)(iv). Defendant further moves this Court
21 to continue the trial date for a period of 30 days and set the new
22 trial date as soon as practicable following **November 23, 2006**, and
23 requests that this Court reset the dates for submission of Motions
24 and Plea Deadline accordingly, for the reasons set forth below. This
25 is Defendant's second request for a continuance.

26 Defendant requests a continuance for the following reasons:

27 1. Defendant requires additional time to prepare for

1 trial. Defendant expects to resolve this matter through a non-trial
2 disposition. However, in the event the anticipated resolution does
3 not occur, Defendant requests 30 days in order to allow defense
4 counsel sufficient time for trial preparation.

5 2. Additional time for this purpose will serve the
6 interests of justice and judicial economy.

7 3. The Government, through AUSA Irene Feldman, has no
8 objection to the requested continuance.

9 Excludable delay under 18 U.S.C. §3161(h)(1)(F) and (8)(A)
10 will occur as a result of this motion and any order based thereon.

11 Pursuant to 18 U.S.C. §3161(h)(8)(A), Defendant, through
12 counsel, hereby waives any speedy trial issues resulting from this
13 requested continuance from the date this motion is filed through the
14 date on which the case is tried.

15 DATED this 17th day of October 2006.

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17
18 *s/Hortencia Delgadillo*
19 HORTENCIA DELGADILLO
20 Attorney for Defendant
21

22 **Original** of the foregoing filed by ECF
23 this 17th day of October 2006 with:

24 Clerk of the Federal District Court
25 405 W. Congress, Suite 1500
26 Tucson, AZ 85701
27

1 **Copy** of the foregoing delivered electronically
this 17th day of October 2006 to:

2 Hon. Cindy K. Jorgenson
3 United States District Court Judge
4 405 W. Congress
Tucson, Arizona 85701

5 Irene Feldman
6 Assistant U.S. Attorney
7 Office of the United States Attorney
405 W. Congress, Suite 4800
Tucson, Arizona 85701