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5
 6 **IN THE UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF ARIZONA**

8	UNITED STATES OF AMERICA,)	No. CR07-0740-004-TUC-CKJ(HCE)
9)	
10	Plaintiff,)	
11	vs.)	MOTION TO CONTINUE:
12	JAIME MORENO-VILLALOBOS)	MOTIONS DEADLINE: PLEA
13	et al,)	DEADLINE; TRIAL DATE
14	Defendant.)	[FIRST DEFENSE REQUEST]

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 16 It is expected that excludable delay pursuant to 18 U.S.C. § 3161 (h)(1)(F) may
 17 occur as a result of this motion or from an order based thereon.

18 **COMES NOW** the Defendant, JAIME MORENO-VILLALOBOS, by and through
 19 his attorney undersigned and hereby moves this Court for a continuance of the
 20 Motions Deadline date, Plea Deadline date and Trial date. The plea deadline is
 21 currently scheduled for August 10, 2007 and the Trial for August 28, 2007. Counsel
 22 undersigned requests a continuance of at least (45) days for the following reasons:

- 23 1. Counsel needs additional time to prepare for trial;
- 24 2. Assistant United States Attorney, Shelly Clemens, has been advised of this
 25 motion and has no objection to this continuance.
- 26 3. All Counsel for co-defendants have been contacted and there have been no
 27 objections to this motion to continue.
- 28

1 The Court is urged to find that circumstances exist which require VACATING
2 the current pre-trial dates and GRANTING a continuance and respectfully urges the
3 Court to Make the following findings:

- 4 1. That this request for a continuance is made in the interests of justice and
5 not simply for the purposes of delay.
- 6 2. That the Court find extraordinary circumstances exist and that the interest
7 of justice requires the pre-trial dates in this matter be continued.
- 8 3. Defendant would waive any speedy trial time limits.

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10 Based on the foregoing, Defense Counsel respectfully requests the scheduled
11 dates be VACATED and a continuance GRANTED.

12 **DATED** this 31st day of July, 2007.

13
14 *s/David R. Valadez*
15 DAVID R. VALADEZ
16 Attorney for Defendant

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19 Copy of the foregoing
20 delivered this date to:

21 Shelly Clemens, AUSA
22 Greta Vietor, Counsel for Enriquez-Hernandez
23 Thomas Hippert, Counsel for Aguilera-Cortez
24 Kevin Lerch, Counsel for Hernandez-Padilla
25 Alfred Islas, Ccounsel for Martinez-Duenas
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