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

8 <b>United States of America,</b>	)	
	)	<b>Case No. CR-08-1463-TUC-RCC-GEE</b>
9 <b>Plaintiff,</b>	)	
	)	<b>MOTION TO EXTEND PLEA</b>
10 <b>v.</b>	)	<b>DEADLINE AND CONTINUE</b>
	)	<b>TRIAL DATE</b>
11 <b>Michael Dee Pulsipher,</b>	)	
	)	
12 <b>Defendant.</b>	)	<b>(Second Request)</b>

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13 It is expected that excludable delay under Title 18, United States Code,  
 14 §3161(h)(8)(A) will occur as a result of this motion or an order based thereon.

15 Defendant Michael Dee Pulsipher , through counsel, requests a 60-day continuance  
 16 of the Plea Deadline set for November 13, 2009 and the Trial set for December 1, 2009.

17 This request for continuance is made for the following reasons:

- 18 1) Additional time is needed for trial preparation.
- 19 2) Assistant United States Attorney, Karen Rolley
- 20 has **no objection** to this continuance.

21 **RESPECTFULLY SUBMITTED: November 6, 2009**

23 The Law Offices of  
 24 Stephanie K. Bond, P.C.

25 *s/Stephanie K. Bond*  
 26 Stephanie K. Bond

27 Copy to:  
 28 Karen Rolley,  
 Assistant United States Attorney



1 addition to other excludable time under the Speedy Trial Act and shall commence as of  
2 the day following the day that would otherwise be the last day for commencement of trial.

3 4. That any and all subpoenas previously issued shall remain in full force and  
4 effect through the new trial date.

5 5. That all motions pending before this Court are hereby held in abeyance.

6 DATED \_\_\_\_\_.

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9 HONORABLE RANER C. COLLINS  
10 UNITED STATES DISTRICT COURT JUDGE  
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