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5 **UNITED STATES DISTRICT COURT**
DISTRICT OF ARIZONA

6 UNITED STATES OF AMERICA,)	No. CR07-00601 TUC RCC (HCE)
)	
7 Plaintiff,)	MOTION TO CONTINUE
8 vs.)	PLEA DEADLINE AND
)	JURY TRIAL
9 HERIBERTO TERRIQUEZ,)	
)	(Defendant's Second Request/
10 Defendant.)	Without Objection)

11 COMES NOW the Defendant, Heriberto Terriquez, by and through undersigned
12 counsel and moves this Court for a 60-day continuance of the trial date in this matter
13 currently scheduled for July 24, 2007 and the Change of Plea Deadline of July 6, 2007 for
14 the reason that discovery is still in progress, some of which necessitates public
15 information requests in Maricopa County. Additionally, should the defendant elect not to
16 accept the government's plea offer sufficient time to prepare pretrial motions and prepare
17 for trial will be required.

18 Counsel for the Defendant has conferred with Michael Logalbo who indicated that
19 he has no objection to a continuance. The Defendant anticipates that excludable delay
20 under Title 18, U.S.C. §3161 (h)(3)(B)(8)(A) will occur as a result of this motion and
21 order.

22 RESPECTFULLY SUBMITTED this 6th day of July, 2007.

23
24 s/ Ralph Malanga

25 _____
Ralph Malanga

1 Copies of the foregoing served electronically or
by other means on July 6, 2007, to:

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3 Hon. Raner C. Collins
4 United States District Court
405 W. Congress, Ste. 5170
Tucson, AZ 85701-5051

5 Michael Logalbo
6 Assistant United States Attorney
405 W. Congress, Ste. 4800
Tucson, AZ 85701-5041

7 Heriberto Terriquez

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