

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
FIRST DIVISION

FILED

2002 APR 22 PM 3:00
PLAINTIFF
CAROLYN STALEY
CIRCUIT COUNTY CLERK

STATE OF ARKANSAS

VS.

NO. CR02-0080

PAUL ANTHONY MOORE

DEFENDANT

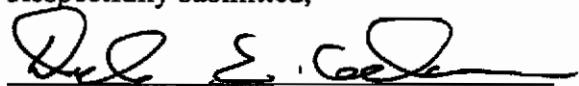
MOTION FOR CONTINUANCE

Comes the Defendant, PAUL ANTHONY MOORE, by and through his attorney,
Dale E. Adams, and for his Motion states:

1. A pretrial hearing is currently scheduled in this case on Monday, April 29, 2002, and a jury trial is scheduled for May 21, 2002.
2. Counsel for Defendant is scheduled to be in United States District Court in a habeas hearing in the case of *Nooner vs. Norris*, scheduled to begin on April 29, 2002; further, counsel is scheduled to be in a jury trial in United States District Court the week of May 20, 2002, in the case of *United States vs. Vincent Duckett*.
3. Defendant therefore moves for a continuance of the pretrial hearing and a jury trial based on the conflicts in defense counsel's schedule.

WHEREFORE, Defendant, PAUL ANTHONY MOORE, prays this Court grant his Motion, that the pretrial and jury trial dates be continued for the reasons set forth herein, and for all other relief to which he may be entitled.

Respectfully submitted,



Dale E. Adams (#77002)
Attorney for Defendant
MONTGOMERY, ADAMS & WYATT, PLC
221 W. Second, Suite 408
Little Rock, AR 72201
(501) 375-8770

EXHIBIT A

000014

CERTIFICATE OF SERVICE

I, Dale E. Adams, do hereby certify that a true and correct copy of the foregoing Motion for Continuance has been provided to Ms. Tonia S. Goolsby, Deputy Prosecuting Attorney, by placing a copy of same in the Prosecuting Attorney's drawer located in the Office of the Pulaski County Circuit Court Clerk, this 27 day of A, 2002.



Dale E. Adams

FILED
IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
FIRST DIVISION

03 JAN 31 AM 11:41

STATE OF ARKANSAS

CAROLYN STALEY
CIRCUIT-COUNTY CLERK PLAINTIFF

VS.

NO. CR02-0080

PAUL ANTHONY MOORE

DEFENDANT

MOTION FOR CONTINUANCE

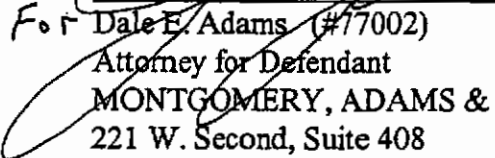
Comes the Defendant, PAUL ANTHONY MOORE, by and through his attorney, Dale E. Adams, and for his Motion states:

1. This case is scheduled for a jury trial on Wednesday, February 5, 2003.
2. Defendant is in the process of filing a Writ of Prohibition with the Arkansas Supreme Court based on the findings of the Court at the pretrial hearing held January 27, 2003; Defendant believes the Supreme Court will not have adequate time to review and rule on the Writ of Prohibition prior to the trial date of February 5, 2003.
3. Further, in preparation for trial, Defendant has requested a copy of the transcript from the pretrial hearing but has been told by the Court Reporter that she is experiencing problems with her equipment and cannot provide a copy of the transcript to Defendant; Defendant asserts that this transcript is necessary to prepare for trial of this case.
4. Defendant therefore moves to continue the trial of this matter to a later date in order to: (1) allow adequate time for the Arkansas Supreme Court to review and decide the Writ of Prohibition; and (2) allow time to obtain the transcript of the pretrial hearing and adequately prepare for trial.

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WHEREFORE, Defendant, PAUL ANTHONY MOORE, prays this Court grant his Motion, that the jury trial scheduled for February 5, 2003, be continued for the reasons set forth herein, and for all other relief to which he may be entitled.

Respectfully submitted,


For Dale E. Adams (#17002)
Attorney for Defendant
MONTGOMERY, ADAMS & WYATT, PLC
221 W. Second, Suite 408
Little Rock, AR 72201
(501) 375-8770

CERTIFICATE OF SERVICE

I, Dale E. Adams, do hereby certify that a true and correct copy of the foregoing Motion for Continuance has been provided to Ms. Tonia S. Goolsby, Deputy Prosecuting Attorney, by placing a copy of same in the Prosecuting Attorney's drawer located in the Office of the Pulaski County Circuit Court Clerk, this 31 day of January, 2003.


For Dale E. Adams

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