

1 FRANNY A. FORSMAN
 Federal Public Defender
 2 Nevada State Bar # 00014
 DEBORAH A. TREVINO
 3 Assistant Federal Public Defender
 411 E. Bonneville Ave., Suite 250
 4 Las Vegas, Nevada 89101
 Tel: (702) 388-6577
 5 Fax: (702) 388-6261

6 Attorney for Williams, C.

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 * * *

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 CHRISTOPHER WILLIAMS

14 Defendant.

CR-S-05-441-KJD(LRL)

STIPULATION TO CONTINUE
MOTION DEADLINES AND
TRIAL DATE
 (First Request)

15 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
 16 United States Attorney, and Kathleen Bliss, Assistant United States Attorney, counsel for the United
 17 States of America, and Franny A. Forsman, Federal Public Defender, and Deborah A. Trevino,
 18 Assistant Federal Public Defender, counsel for Christopher Williams, that the calendar call currently
 19 scheduled for Tuesday, January 31, 2006 at the hour of 9:00 a.m., and the trial currently scheduled
 20 for Monday, February 6, 2006 at the hour of 9:00 a.m. be vacated and set to a date and time
 21 convenient to this court but no earlier than 60 days for pretrial motions.

22 IT IS FURTHER STIPULATED AND AGREED, that the parties herein shall have
 23 to and including April 3, 2006, by the hour of 4:00 p.m., within which to file any and all pretrial
 24 motions and notices of defense.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that
 26 they shall have to and including April 14, 2006, by the hour of 4:00 p.m., within which to file any
 27 and all responsive pleadings.
 28

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that
2 they shall have to and including April 17, 2006, by the hour of 4:00 p.m., within which to file any
3 and all replies to dispositive motions.

4 This Stipulation is entered into for the following reasons:

5 1. Additional time is needed to complete defense investigations, including
6 witness interviews to determine whether pretrial motions are appropriate in the above-captioned
7 case.

8 2. The additional time requested herein is not sought for purposes of delay, but
9 merely to allow counsel for defendant sufficient time within which to be able to effectively and
10 thoroughly research, prepare and submit for filing appropriate pretrial motions.

11 3. The additional time requested by this stipulation, is excludable in computing
12 the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C.
13 §3161(h)(8)(A), considering the factors under 18 U.S.C. §§ 3161(h)(8)(B)(i) and 3161(h)(8)(B)(iv).

14 4. This is the first request for continuance filed herein.

15 DATED this 26th day of January, 2006

16 FRANNY A. FORSMAN
17 Federal Public Defender

DANIEL G. BOGDEN
United States of America

18
19 By: /S/ Deborah A. Trevino
20 DEBORAH A. TREVINO,
21 Assistant Federal Public Defender
For WILLIAMS

By: /S/ Kathleen Bliss
KATHLEEN BLISS
Assistant United States Attorney

1 FRANNY A. FORSMAN
Federal Public Defender
2 Nevada State Bar # 00014
DEBORAH A. TREVINO
3 Assistant Federal Public Defender
411E. Bonneville Ave., Suite 250
4 Las Vegas, Nevada 89101
Tel: (702) 388-6577
5 Fax: (702) 388-6261

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 * * *

9 UNITED STATES OF AMERICA,

CR-S-05-441-KJD(LRL)

10 Plaintiff,

FINDINGS OF FACT, CONCLUSIONS OF
LAW, AND ORDER

11 vs.

12 CHRISTOPHER WILLIAMS,

13 Defendant.

14 **FINDINGS OF FACT**

15 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
16 Court finds that:

17 1. Additional time is needed to complete defense investigations, including
18 witness interviews to determine whether pretrial motions are appropriate in the above-captioned
19 case.

20 2. The additional time requested herein is not sought for purposes of delay, but
21 merely to allow counsel for defendant sufficient time within which to be able to effectively and
22 thoroughly research, prepare and submit for filing appropriate pretrial motions.

23 3. The additional time requested by this stipulation, is excludable in computing
24 the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C.
25 §3161(h)(8)(A), considering the factors under 18 U.S.C. §§ 3161(h)(8)(B)(i) and 3161(h)(8)(B)(iv).

26 4. This is the first request for continuance filed herein.

27 For all of the above-stated reasons, the ends of justice would best be served by a continuance of the
28 trial dates.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONCLUSIONS OF LAW

Because of the complexity of this case, counsel for the defendant requires additional time to complete defense investigations review the new case file. The current schedule does not afford counsel sufficient time and opportunity to effectively and thoroughly do so. The failure to grant said continuance would be likely to result in a miscarriage of justice.

ORDER

IT IS THEREFORE ORDERED, that the parties herein shall have to and including April 3, 2006, by the hour of 4:00 p.m., within which to file any and all pretrial motions and notices of defense.

IT IS FURTHER ORDERED, by and between the parties, that they shall have to and including April 14, 2006, by the hour of 4:00 p.m., within which to file any and all responsive pleadings.

IT IS FURTHER ORDERED, by and between the parties, that they shall have to and including April 17, 2006, by the hour of 4:00 p.m., within which to file any and all replies to dispositive motions.

IT IS FURTHER ORDERED that trial briefs, proposed voir dire questions, proposed jury instructions, and a list of the Government’s prospective witnesses must be submitted to the Court by the ____ day of _____, 2006, by the hour of 4:00 p.m.

IT IS FURTHER ORDERED that the calendar call currently scheduled for Tuesday, January 31, 2006 at the hour of 9:00 a.m., be vacated and continued to _____ at the hour of _____ .m.; and the trial currently scheduled for Monday, February 6, 2006 at the hour of 9:00 a.m. be vacated and continued to _____ at the hour of _____ .m.

DATED ____ day of _____, 2006.

UNITED STATES DISTRICT JUDGE