

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA            )  
  )  
                          v.                    ) Criminal No. 07-368  
  )  
TONY MARCELLUS FREDERICKSON        )

**MOTION TO EXTEND THE TIME  
FOR FILING PRETRIAL MOTIONS**

AND NOW comes the defendant, Tony Marcellus Frederickson, by his attorney, W. Penn Hackney, Assistant Federal Public Defender, and respectfully moves this Honorable Court for an extension of time of 60 days in which to file pretrial motions. In support thereof, counsel states:

1. The defendant, Tony Marcellus Frederickson, was arraigned on an indictment alleging violations of Title 18, U.S.C. §§ 922(g)(1), 922(n), and 922(a)(6). Pursuant to Local Rule 12.1, certain pretrial motions are due on October 27, 2008.
2. Additional time is needed to complete counsel's investigation of the facts and law before informed decisions can be made concerning the filing of pretrial motions.

3. Additionally, defense counsel will be out of the office from October 25, 2008 through November 7, 2008.

4. Undersigned counsel was unable to reach Assistant United States Attorney Ross Lenhardt to seek his consent to this motion.

WHEREFORE, your defendant, Tony Marcellus Frederickson, respectfully moves this Honorable Court to extend the time for filing pretrial motions for 60 days from October 27, 2008.

Respectfully submitted,

s/ W. Penn Hackney  
W. Penn Hackney, Assistant  
Federal Public Defender  
Attorney I.D. No. 29671