

R. Michael Skupin, Esq. (#019598)

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Attorney for Defendant

JARRETT B. MAUPIN, II

**IN THE UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

**United States of America,**

**Plaintiff,**

**vs.**

**Jarrett B. Maupin, II,**

**Defendant.**

**No. CR09-00052-001-PHX-DGC**

**MOTION TO CONTINUE  
SENTENCING**

**(First Request)**

DEFENDANT JARRETT B. MAUPIN, II, by and through undersigned counsel, respectfully moves this Honorable Court for an Order continuing Sentencing in this matter presently scheduled for July 27, 2009 for a period of no less than sixty (60) days, subject to the Court's calendar, for the foregoing reasons.

On July 2, 2009, undersigned counsel received the draft of the Presentence Investigation Report Guideline authored by Justine L. Kozak of the United States Probation Office. In light of the report, undersigned counsel would like additional time to file an objection.

Undersigned counsel avows that he has contacted the assigned Assistant United States Attorney, Rachel C. Hernandez, regarding her position to this motion. Undersigned counsel avows that Ms. Hernandez has no objection to the Court granting the relief requested herein.

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Furthermore, undersigned counsel avows that Ms. Hernandez indicated that she also plans on filing an objection to the Presentence Investigation Report Guideline.

This motion is made in good faith and will serve the public’s interest in that providing Defendant with effective representation is necessary to insure fairness and to protect the Defendant’s constitutional rights. A continuance will insure counsel for both the government and the Defendant the reasonable time necessary for effective preparation for sentencing in this matter.

It is expected that excludable delay under 18 U.S.C. §3161(h)(8)(A); (B)(iv) and (h)(1)(f) may result from this motion or from an order based thereon.

**THEREFORE**, based on the foregoing, defendant, by and through undersigned counsel, respectfully requests that this Honorable Court enter an Order continuing Sentencing in this matter for a period of no less than sixty (60) days from July 27, 2009, subject to the Court’s calendar.

**RESPECTFULLY SUBMITTED** this 7<sup>th</sup> day of July, 2009.

**MORRISON SKUPIN, PLLC**

By: s/R. Michael Skupin  
R. Michael Skupin, Esq.  
845 North 6<sup>th</sup> Avenue  
Phoenix, Arizona 85003  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

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I certify that on July 7<sup>th</sup>, 2009, I electronically transmitted this document to the Clerk’s Office using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

- Clerk of the Court
- The Honorable David Campbell  
United States District Judge  
401 W. Washington Street  
Phoenix, Arizona 85004
- Rachel C. Hernandez, Esq.  
Assistant U.S. Attorney  
Two Renaissance Square  
40 North Central Avenue, Suite 1200  
Phoenix, Arizona 85004-4408

By: s/ R. Michael Skupin

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