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5 **ATTORNEY FOR: DEFENDANT**

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10 United States of America,
11 Plaintiff,
12
13 v.
14 James R. Parker,
Defendant.

Case No. 10-CR-757-ROS-PHX

**MOTION TO EXTEND TIME TO FILE
NOTICES OF APPEARANCE AND
PROPOSED JOINT SCHEDULING
ORDER**

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18 NOW COMES the Defendant, by Attorney Joy Bertrand, to ask this Court to
19 extend the time for the filing of Notices of Appearance for new counsel for the
20 Defendants and for the filing of the parties' proposed joint scheduling order. As
21 further grounds therefore, counsel submits the following:
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24 Currently, the Notices of Appearance for new counsel for the Defendants are due
25 August 13, 2010. The Court also has set August 24, 2010 as the due date for the parties'
26 proposed joint scheduling order. (ECF Doc. 23).
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28 The attorney who will be lead counsel for Mr. Parker, Michael Minns, has been in
29 China for the past month. Today was his first day back at work. He intends to finalize

1 his representation of Mr. Parker within the next two weeks. With the finalization of
2 those arrangements also will be the finalization of representation for Mrs. Parker. As
3 discussed at the July 26, 2010 status conference, counsel believes the best practice is to
4 arrange for separate counsel for each of the Defendants. Mr. Minns' office believes that
5 these details will be resolved and his Notice of Appearance can be finalized by August
6 24, 2010.
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9 As stated previously to the Court, Mr. Minns and counsel have no objection to
10 the proposed schedule submitted by the Government. (ECF Doc. 19-1). However, we
11 believe that Mr. Minns should appear in this case before conferring with the
12 Government to confirm this. To this effect, counsel asks this Court to extend the time to
13 file a proposed joint scheduling order to August 27, 2010. Counsel believes that the
14 extension of these two deadlines will not affect the Status Hearing, which is scheduled
15 for August 30, 2010.
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18 On August 9, 2010, AUSA Peter Sexton stated that he had no objection to this
19 Motion.
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21 The Court will find attached a proposed Order.

22 RESPECTFULLY SUBMITTED on August 9, 2010.
23

24 s/Joy Bertrand
25 Joy Bertrand
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CERTIFICATE OF SERVICE

On August 9, 2010, I, Joy Bertrand, filed this Motion to Extend Time with the Arizona District Court’s electronic filing system. Based on my training and experience with electronic filing in the federal courts, it is my understanding that a copy of this request will be electronically served upon opposing counsel, Peter Sexton, upon its submission to the Court.

Respectfully submitted Ninth day of August, 2010.

s/Joy Bertrand
Joy Bertrand

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,
Plaintiff,

Case No. 10-CR-757-ROS-PHX

v.

ORDER

James R. Parker,
Defendant.

Upon Motion of the Defendant, with no objection from the Government and with good cause appearing,

The Defendant's Motion to Extend Time to File Notices of Appearance and Proposed Joint Scheduling Order is GRANTED.

IT IS FURTHER ORDERED that the Notices of Appearance for both Defendants shall be filed by August 24, 2010.

IT IS FURTHER ORDERED that the parties' Proposed Joint Scheduling Order shall be filed by August 27, 2010.

SO ORDERED this _____ day of August, 2010.

Roslyn O. Silver
District Court Judge