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Attorney for the Defendant

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

JAMES PARKER, et. al,
Defendants.

No. 10-CR-757-PHX-ROS

**JOINT MOTION TO EXTEND THE
DEFENDANTS’ DISCOVERY
DEADLINES**

NOW COMES the Defendants to Move this Court to extend the Defense’s January 31, 2011 discovery deadlines. As further grounds therefore, the Defendants submit the following:

On January 16, 2011, the Government filed an Amended Motion to Extend Time to File Responses to the Defendant’s motions. The Government noted in its motion that the Defendants did not object to the Government’s request, if the Defendants’ time to submit its initial discovery to the Government would be extended three weeks.

The timing of the Defendants’ discovery releases is related to the Government’s motion responses, because the extent of the Government’s additional discovery releases impacts what the Defendants must disclose to the Government.

The Government does not oppose this Motion.

The Court will find attached a proposed Order.

RESPECTFULLY SUBMITTED this 24th day of January, 2011.

By: s/Joy Bertrand
Joy Bertrand
Attorney for Defendant Jacqueline Parker

s/Rain Minns
Rain Minns
Attorney for Defendant James Parker

s/John McBee
John McBee
Attorney for Defendant James Parker

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CERTIFICATE OF SERVICE

On January 24, 2011, I, Joy Bertrand, attorney for the Defendant, Jacqueline Parker, filed the Defendant’s Motion to Extend the Defendants’ Discovery Deadlines *via* ECF. 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, and co-counsel, Michael Minns, Rain Minns, and John McBee, upon its submission to the Court.

Respectfully submitted this 24th day of January, 2010.

s/Joy Bertrand
Joy Bertrand
Attorney for Defendant

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**IN THE UNITED STATES DISTRICT COURT
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No. 10-CR-757-PHX-ROS

ORDER

Upon Joint Motion of the Defendants, and with good cause appearing, to wit: the effect that the delay in the Government’s motion responses has on the Defendants’ potential discovery obligations:

IT IS ORDERED, granting the Defendant’s Motion to Extend Defendants’ January 31, 2011 Discovery Deadlines.

IT IS FURTHER ORDERED that the Defendants’ January 31, 2011 discovery deadline is now February 21, 2011.

SO ORDERED, this _____ day of _____, _____.

Roslyn O. Silver
District Court Judge