

1 JOHN S. LEONARDO
United States Attorney
District of Arizona

2
3 PETER SEXTON
Arizona State Bar No. 011089
Assistant U.S. Attorney
peter.sexton@usdoj.gov

4
5 WALTER PERKEL
New York State Bar
Assistant U.S. Attorney
walter.perkel@usdoj.gov
6 Two Renaissance Square
7 40 N. Central Avenue, Suite 1200
Phoenix, Arizona 85004-4408
Telephone (602) 514-7500

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF ARIZONA

11 United States of America,
12
13 Plaintiff,
14
15 v.
16 Jacqueline Parker,
17
18 Defendant.

CR 10-0757-02-PHX-ROS
GOVERNMENT’S MOTION TO
ENLARGE TIME TO RESPOND TO
DEFENDANT’S HYDE AMENDMENT
PLEADING (CR 206)

17 On July 27, 2012, defendant Jacqueline Parker moved for attorney’s fees and costs under
18 the Hyde Amendment. (CR 206.) The government requests that it be allowed to file its response
19 by Friday, September 14, 2012. Defense counsel does not object to the requested extension.

20 The additional time is needed to address the many factual and legal issues raised in
21 defendant’s Motion. To help address the numerous factual assertions in the Motion, the
22 undersigned got authority yesterday to order a full set of transcripts for the hearings and trial that
23 took place in this matter. Those transcripts are estimated to be completed in about two weeks.
24 The government would then need additional time to review the full record before responding to
25 the serious allegations raised in defendant’s Motion.
26
27
28

1 For these reasons, the government would respectfully request that the Court allow
2 government counsel until September 14, 2012 in which to respond to this Motion.

3 Respectfully submitted this 2nd day of August, 2012.

4 JOHN S. LEONARDO
5 United States Attorney
6 District of Arizona

7 */s Peter Sexton*

8 PETER SEXTON
9 WALTER PERKEL
Assistant U.S. Attorneys

10 I hereby certify that on this date, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF
11 system for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant: Joy Bertrand

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

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

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,
Plaintiff,
v.
Jacqueline Parker,
Defendant.

CR-10-0757-02-PHX-ROS
ORDER

Upon motion of the United States and good cause appearing as stated in the government's motion, and without objection from defense counsel,

IT IS HEREBY ORDERED granting the government's Motion to Enlarge Time to Respond to Defendant's Hyde Amendment Pleading (CR 206), until September 14, 2012.

Excludable delay under 18 U.S.C. § 3161(h)_____ is found to commence on _____, 20____, for a total of _____ days.

DATED this _____ day of August, 2012.

HONORABLE ROSLYN O. SILVER
Chief United States District Judge