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8 Asst. Federal Public Defender
9 Attorney for Defendant
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11 IN THE UNITED STATES DISTRICT COURT
12 DISTRICT OF ARIZONA

13 United States of America,
14 Plaintiff,
15 vs.
16 Thomas Mario Costanzo,
17 Defendant

No. CR-17-0585-01-PHX-GMS
**MOTION TO EXTEND DEADLINE
FOR REPLIES TO GOVERNMENT
RESPONSES TO PRETRIAL
MOTIONS TO DECEMBER 15, 2017**
(First Request)

18 Undersigned counsel, on behalf of Mr. Costanzo, moves this court to
19 extend the deadline for filing replies to the government's responses to pretrial
20 motions to December 15, 2017.

21 This request is made to allow undersigned counsel sufficient time to
22 effectively represent the defense in this aspect of pretrial motions litigation.

23 Assistant United States Attorneys Binford, Escalante, and Restaino
24 have been contacted regarding this request. AUSA Binford has advised that the
25 government does not object to this requested extension of time to reply.

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1 Excludable delay under 18 U.S.C. § 3161(h)(1)(D) may result from this
2 motion or from an order based thereon.

3 Respectfully submitted: December 6, 2017.

4 JON M. SANDS
5 Federal Public Defender

6 s/Maria Teresa Weidner
7 MARIA TERESA WEIDNER
8 Asst. Federal Public Defender

9 Copy of the foregoing transmitted by ECF for filing December 6, 2017, to:

10 CLERK'S OFFICE
11 United States District Court
12 Sandra Day O'Connor Courthouse
13 401 W. Washington
Phoenix, Arizona 85003

14 MATTHEW H. BINFORD
15 FERNANDA CAROLINA ESCALANTE KONTI
16 GARY RESTAINO
17 Assistant U.S. Attorneys
18 United States Attorney's Office
Phoenix, Arizona 85004-4408

19 Copy mailed to:

20 THOMAS MARIO COSTANZO
21 Defendant

22 s/yc
23 _____