

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08-00297-02-CR-W-FJG
)	
JEROME S. HOWARD,)	
)	
Defendant.)	

**MOTION OF DEFENDANT JEROME S. HOWARD
TO DECLARE CASE EXTENDED AND COMPLEX,
WITH SUGGESTIONS IN SUPPORT**

COMES NOW Defendant Jerome Howard, by and through his undersigned attorney, and moves the Court to declare this case extended, pursuant to §2.22(B)(3) of the Criminal Justice Act Guidelines, and complex pursuant to 18 U.S.C. §3006A(d)(3).

IN SUPPORT of this Motion, Defendant states as follows:

1. On October 29, 2008, the Grand Jury sitting in the Western District of Missouri returned a thirty-four count Indictment which charged all seventeen defendants in Count One with conspiring to commit mortgage fraud, in violation of 18 U.S.C. § 371, and various defendants were also charged in substantive counts with interstate transportation of money obtained by fraud, in violation of 18 U.S.C. §§ 2314 and 2, wire fraud in violation of 18 U.S.C. §§ 1343 and 2, and monetary transactions involving the proceeds of a criminal offense, in violation of 18 U.S.C. §§ 1957 and 2. The indictment also contained forfeiture allegations against defendant Howard in the amount of \$12,616,990.00. The Indictment itself is sixty-four pages in length.

2. Defense counsel has been advised there are approximately sixty thousand pages of discovery. With the number of defendants and volume of discovery, this case will involve significantly more attorney time than the average federal criminal case. It is anticipated defense counsel will be required to expend an extraordinary amount of time reviewing discovery materials, and generally in properly investigating these matters and preparing for trial or other disposition. Trial of this case can be expected to last several weeks.

3. It is respectfully suggested that this case should be determined to be “extended” pursuant to §2.22(B)(3) of the CJA Guidelines, and that it qualifies as “complex” pursuant to 18 U.S.C. §3006A(d)(3). Counsel therefore requests that the Court make these findings and authorize payment to all appointed defense counsel in excess of the maximum compensation amounts set forth in 18 U.S.C. §3006A(d). Further, counsel requests that the submission of interim vouchers for legal services and expenses be authorized.

WHEREFORE, Defendant Howard prays that this Court declare this case extended and complex, and release counsel from the restrictions of the ordinary CJA compensation, as well as allow counsel to submit requests for interim payment for legal services and expenses.

/s/Ronald E. Partee
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Attorney for Defendant Howard

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the following: Linda Parker Marshall, Assistant United States Attorney, and all counsel of record.

/s/Ronald E. Partee
Ronald E. Partee