

the hearing today. The case against Taylor is straightforward, and while the defendant may not have had a personal copy of it, the defendant has been aware of, and has had access to, the discovery for almost ten months.

The United States is ready for trial on Tuesday, along with the 37 witnesses on its witness list (although the government expects to actually call approximately 20 witnesses). But the government was not in a position to advise the court of conflicts regarding upcoming trial dockets. After reviewing calendars, the undersigned realizes that he is scheduled to be at a Securities Fraud conference in Utah the week before the first week of the February trial docket, and is intending to stay on vacation through the weekend, with a late return flight on President's Day. Case agent Michael Mrachek is scheduled to be out of state on vacation during the same period. For those reasons, if the court is inclined to grant defendant Taylor's request for an additional continuance, and if it is convenient for the court to accommodate, the United States respectfully requests that the court set the trial on either the second week of the February docket (February 22, 2010) or on either week of the trial docket beginning March 22, 2010.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on January 11, 2010, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Daniel M. Nelson

Daniel M. Nelson
Assistant United States Attorney