

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

UNITED STATES OF AMERICA,
Plaintiff,

Vs.

Case No. 10-00162-23-CR-W-FJG

ALEJANDRO HOLGUIN-BONILLA,
Defendant

DEFENDANT'S MOTION TO CONTINUE CURRENT TRIAL SETTING and
SUGGESTIONS IN SUPPORT OF THE SAME

COMES NOW the defendant Alejandro Holguin-Bonilla and does hereby move the court for an order that continues the current trial setting of August 2010. In support of said motion the defendant would state as follows:

1. Mr. Holguin-Bonilla is one of 23 defendants charged in a Superseding Indictment alleging various violations of the Controlled Substances Act. He currently is free on a pretrial release bond.
2. Preliminary information from the government's attorney suggests that discovery in this matter is voluminous and is in the process of being reproduced for defense counsel. Also, this is a Title III case and it is anticipated that the discovery will contain many hours of recorded conversations.
3. Defense counsel has reached out to the government and all defense counsel regarding a potential trial date. Currently it appears that the counsel that have responded have for the most part agreed to a February trial date in this matter.
4. The defendant has no objection to this request.
5. Given the volume of discovery and the number of defendants in this case, counsel is

requesting this matter be continued until the February docket so that she has enough time to review the discovery, conduct whatever independent investigation may be necessary, prepare, file and litigate pretrial motions and ultimately prepare for trial. This request is made in order to provide defense counsel the reasonable time necessary for effective preparation as guaranteed under the Sixth Amendment and taking into consideration due diligence of counsel. Pursuant to 18 U.S.C. 3161(7)(A), the defense requests that the Court finds that the ends of justice are served by continuing this matter to the next trial docket and that this continuance outweighs the best interest of the public and the defendant in a speedy trial.

For the above stated reasons, Mr. Holguin-Bonilla requests that this matter be removed from the August 2010 docket and continued until the February 2011 trial docket.

/s/ John M. Duma
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on June 29th, 2010, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to Brent Venneman, Assistant United States Attorney, 400 E. Ninth Street, Suite 5510, Kansas City, MO 64106 and all other counsel of record. I further certify that I mailed the foregoing document and notice of electronic filing by first-class mail to the following non-CM/ECF participants: N/A

/s/ John M. Duma
JOHN M. DUMA #10760