

UNITED STATES OF AMERICA,)
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)
)
Plaintiff,)
) Case No. 08-00026-03/05-CR-W-FJG
vs.)
)
DELMON L. JOHNSON,)
)
Defendant.)

COMES NOW, Darren Fulcher, appointed counsel for defendant Delmon Johnson and moves this Court for an Order approving litigation costs for travel pursuant to the Criminal Justice Act. Undersigned counsel states the following in support.

1. A twenty-four count indictment was returned on February 6, 2008 against Delmon Johnson. The charges involve allegations of the conspiracy to distribute controlled substances and faces up to twenty years in prison.

3. On April 19, 2010 Counsel for the Defendant, Delmon Johnson would like to travel to Houston, Texas to meet with his client in preparation of trial. The Criminal Justice Act also allows for the payment of travel and related expenses to Counsel in this matter.

4. Counsel cannot adequately represent his client without meeting with him to discuss facts of the case and case strategy.

5. Counsel will advise the Court now that additional requests will be made for travel should the government make additional discovery available to the defense.

WHEREFORE, undersigned counsel moves the Court for an Order Approving the Litigation costs for travel or for whatever other relief this Court deems just and proper.

Respectfully Submitted,

Fulcher & Brooks, L.L.C.

____/s/Darren E Fulcher_____

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on April 8, 2010, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsels of record.

____/s/ Darren E. Fulcher_____
Darren E. Fulcher