

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 16 CR 64

RONALD D. VAN DEN HEUVEL,
Defendant.

MOTION TO EXTEND TIME

COMES NOW the above named defendant, Ronald Van Den Heuvel, through Attorney Robert LeBell, and hereby moves the Court for an order to extend time for the defendant to file his reply briefs to the government's responses relating to pretrial motions until August 18, 2017. The defendant relies upon the attached memorandum.

Dated at Milwaukee, Wisconsin this 19th day of July, 2017.

Respectfully submitted,

/s/ Robert G. LeBell

Robert G. LeBell, SBN 01015710
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Defendant.

MEMORANDUM IN SUPPORT OF MOTION TO EXTEND TIME

The defendant states the following: Mr. Van Den Heuvel has filed both evidentiary and non-evidentiary motions. Pursuant to the established schedule, the defendant's reply briefs are due on July 25, 2017. An evidentiary hearing has been scheduled for August 11, 2017, before Judge Griesbach.

Counsel for Mr. Van Den Heuvel will undergo surgery on July 25, 2017, to address a significant physical issue. It is anticipated that the recovery period will be one to two weeks which will likely require counsel's absence from his office. It appears that resolution of the non-evidentiary motions will not impact on the August 11th proceedings before Judge Griesbach. The case is scheduled for pretrial and trial on October 6th and 23rd, respectively. Counsel's surgery and all the surrounding preparation has limited counsel's ability to file replies by the July 25th deadline.

As such it is respectfully requested that the Court extend the time for the filing of defendant's reply briefs until August 18, 2017.

Dated at Milwaukee, Wisconsin this 19th day of July, 2017.

Respectfully submitted,

/s/ Robert G. LeBell

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