

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 16 CR 00064-WCG-DEJ
v.)	
)	Honorable William Griesbach
Ron Van Den Heuvel et. al,)	Magistrate Judge David E. Jones
)	
Defendant.)	
)	
)	
)	

DEFENDANT KELLY VAN DEN HEUVEL’S UNOPPOSED MOTION TO EXTEND

Now comes Defendant, KELLY VAN DEN HEUVEL, by and through her attorneys, and hereby moves this Honorable Court for an Order to extend the time for Kelly Van Den Heuvel to file her reply briefs to the Government’s responses to the pretrial motions until August 18, 2017.

In support thereof Ms. Van Den Heuvel states:

1. On July 20, 2017, the Court granted Mr. Van Den Heuvel’s motion to extend the time to file his reply briefs to August 18, 2017. *See* Dkt. 123.
2. Counsel for Ms. Van Den Heuvel anticipates that communications with counsel for Mr. Van Den Heuvel may be necessary to finalize the reply briefs to all pretrial motions. To that end, counsel for Ms. Van Den Heuvel believes it will serve the interests of judicial efficiency to have all reply briefs filed on the same date.
3. Counsel for Ms. Van Den Heuvel has conferred with the Government and the Government does not oppose this motion.

For these reasons, Defendant, KELLY VAN DEN HEUVEL, requests that this Court grant her motion and extend the time for Ms. Van Den Heuvel to file her reply briefs to August 18, 2017.

Respectfully submitted,

/s/ Andrew Porter

Andrew C. Porter
Carrie DeLange
DRINKER, BIDDLE, and REATH LLP
191 N. Wacker Drive, Suite 3700
Chicago, Illinois 60606
312-569-1000
Andrew.Porter@dbr.com
Carrie.DeLange@dbr.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5 and the General Order on Electronic Case Filing (ECF), the following document:

DEFENDANT KELLY VAN DEN HEUVEL'S MOTION TO EXTEND

was served pursuant to the district court's ECF system.

_____/s/ Andrew Porter