

September 1, 2017

Honorable William C. Griesbach
U.S. District Court Judge
Eastern District of Wisconsin
Green Bay Division
125 S. Jefferson Street
Green Bay, WI 54305

**RE: U.S. v. Ronald Van Den Heuvel
Case No. 16 CR 64**

Dear Judge Griesbach:

On a previous occasion, you established a schedule in the above referenced matter by which Jury Instructions and Motions in Limine are to be filed by September 15, 2017. Judge Jones recently issued a recommendation which would sever defendant Kelly Van Den Heuvel from the trial of her husband, my client, Ronald Van Den Heuvel. My client's case would be tried on October 23, 2017. Counsel for the government and I have been consulting regarding this action and jointly respectfully request that the court amend the scheduling to provide as follows: Jury Instructions and Motions in Limine to be filed by September 27, 2017, and responses by October 4, 2017. The additional time is needed to accommodate our discussions regarding this matter and our respective calendars, subject to the court's approval.

Thank you for your consideration.

Sincerely,

/s/ Robert G. LeBell

Attorney Robert G. LeBell

cc: Ron Van Den Heuvel