

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 17-CR-160

RONALD VAN DEN HEUVEL,

Defendant.

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**UNOPPOSED MOTION TO EXTEND DEADLINE  
FOR RULE 404(b) DISCLOSURE**

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The United States of America, by and through its attorneys, Matthew D. Krueger, United States Attorney, and Rebecca Taibleson, Assistant United States Attorney, hereby submits this unopposed motion to extend the deadline for the United States' disclosure of Rule 404(b) evidence, for the reasons that follow:

1. At a hearing on April 17, 2018, the defendant requested that this Court set an early deadline for the United States' pre-trial disclosure pursuant to Federal Rule of Evidence 404(b). The Court granted that request and set a deadline of June 15, 2018. At the same hearing, the Court also established a motions calendar, requiring that motions be filed by July 16, 2018. The Court set a trial date of November 13, 2018.

2. The parties have since discussed the calendar in this case, and specifically the timing of the Rule 404(b) disclosure and any objections thereto. Both parties understand that any objections to the United States' Rule 404(b) disclosure would properly be filed in a motion in limine, which would not be due on July 16, 2018, but would rather precede the November 2018 trial date.

3. The United States has also determined that it would be difficult to prepare a specific and comprehensive Rule 404(b) disclosure by the current deadline of June 15, 2018, which is roughly five months before the trial in this matter.

4. The United States has conferred with counsel for the defendant and has confirmed that the defendant has no objection to an extension of the deadline for filing the Rule 404(b) disclosure to August 17, 2018.

For the aforementioned reasons, the United States respectfully requests that the Court extend the deadline for disclosure of Rule 404(b) evidence until August 17, 2018.

Dated at Milwaukee, Wisconsin, this 3rd day of May, 2018.

Respectfully submitted,

MATTHEW D. KRUEGER  
United States Attorney

By: s/Rebecca Taibleson

REBECCA TAIBLESON  
Bar No. 1104085  
Assistant United States Attorney  
Office of the United States Attorney  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 530  
Milwaukee, Wisconsin 53202  
Telephone: (414) 297-1630  
Fax: (414) 297-1738  
[rebecca.taibleson@usdoj.gov](mailto:rebecca.taibleson@usdoj.gov)