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ATTORNEYS AT LAW

November 2, 2018

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. 17 CR 160

Dear Judge Griesbach:

Mr. Van Den Heuvel entered his guilty plea in this matter on October 12, 2018 and the court set December 10, 2018 as the sentencing date. At the time of the plea, I advised you that I may be utilizing the services of a mitigation specialist and further, that I may be requesting additional time. My understanding was that you would favorably consider a request to move the hearing. The short period between sentencing date and plea was set for two reasons: the preparation for the PSR would be lessened by the previous report submitted in 16-CR-64 and, because of the defendant's incarceration and health concerns.

I have retained the services of a mitigation specialist and have been working to address the sentencing issues in this matter. She has been actively working on Mr. Van Den Heuvel's case. However, the brief period between the two hearings will not allow sufficient time to adequately prepare for the sentencing in this matter. Additionally, an issue developed which may impact on the scope of the issues to be addressed at the dispositional hearing. The government will be submitting a rather large volume of materials to the court for its consideration. If the government persists on its intent to introduce these documents, it may precipitate lengthy testimony and/or argument. Counsel for the government and I are attempting to resolve this matter. I have consulted with my client, who has no objection to the adjournment request set forth in this letter.

As such, it is respectfully requested that the court adjourn the sentencing for several weeks. It would be appreciated if the matter could be set during the first few weeks of January 2019.

Sincerely,

/s/ Robert G. LeBell

Attorney Robert G. LeBell