

No. 19-1236

IN THE
UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

UNITED STATES OF AMERICA, Plaintiff-Appellee, vs. RONALD H. VAN DEN HEUVEL, Defendant-Appellant.	Appeal from the United States District Court for the Eastern District of Wisconsin Case No. 17-CR-160 Hon. William C. Griesbach, United States District Judge, Presiding.
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**MOTION FOR EXTENSION OF TIME
TO FILE DEFENDANT-APPELLANT'S BRIEF**

Now comes the Defendant-Appellant RONALD H. VAN DEN HEUVEL, by his attorney, and pursuant to Federal Rule of Appellate Procedure 26(b) and Circuit Rule 26, moves this Court for the entry of an order granting an extension of time up to and including August 12, 2019, to file the Defendant-Appellant's brief in the above-entitled case currently due for filing on July 11, 2019. In support thereof, counsel submits the attached affidavit. Current counsel has filed one previous motion for extension of time in this case.

RONALD H. VAN DEN HEUVEL
Defendant-Appellant

s/ Johanna M. Christiansen
JOHANNA M. CHRISTIANSEN
Assistant Federal Public Defender
Office of the Federal Public Defender
401 Main Street, Suite 1500
Peoria, Illinois 61602
Phone: (309) 671-7891
Email: Johanna_Christiansen@fd.org
COUNSEL FOR DEFENDANT

STATE OF ILLINOIS)
)
COUNTY OF PEORIA) SS

AFFIDAVIT OF COUNSEL

JOHANNA M. CHRISTIANSEN, being first duly sworn on oath, deposes and states as follows:

1. The Federal Public Defender for the Central District of Illinois, THOMAS W. PATTON, is the attorney appointed to represent the Defendant Appellant Ronald H. Van Den Heuvel in Cause Number 19-1236 that is currently pending before the United States Court of Appeals for the Seventh Circuit and I, JOHANNA M. CHRISTIANSEN, am an attorney with the Federal Public Defender for the Central District of Illinois who is primarily responsible for the Defendant-Appellant's appeal.

2. On March 13, 2019, this Court appointed the Federal Public Defender for the Central District of Illinois to represent Mr. Van Den Heuvel on appeal.

3. Since being appointed, counsel has obtained the record on appeal, the relevant transcripts, and the presentence investigation report.

4. Counsel needs more time to review the record on appeal, research potential issues, and consult with her client, who is current incarcerated.

5. In addition to her other duties as an Assistant Federal Public

Defender, counsel has been involved with the following matters which have occupied a substantial amount of time in the last 30 days:

- a. *United States v. Malcolm Carpenter*, Cause Number 18-3377, Brief filed on June 13, 2019;
- b. *United States v. Robert Lemenager*, Cause Number 17-3324, Position Statement filed on July 2, 2019;
- c. *United States v. James LeDonne*, Cause Number 18-2729, Opening Brief to be filed on or before July 8, 2019;
- d. *United States v. Mark Harder*, Cause Number 18-3699, Opening Brief to be filed on or before July 10, 2019;
- e. *United States v. Shane Inghels*, Cause Number 18-3598, Opening Brief to be filed on or before July 10, 2019;
- f. *United States v. Peter Konopka*, Cause Number 18-3663, Opening Brief to be filed on or before July 10, 2019;

6. In addition, on June 5, 2019, an immediate family member of counsel's died unexpectedly. This sudden death caused counsel to be out of the office for a significant amount of time during the month of June to care for her minor daughter and handle funeral arrangements.

7. Counsel will give this matter her utmost attention and file Mr. Van Den Heuvel's brief on or before the date requested in the motion for extension of time.

s/ Johanna M. Christiansen
JOHANNA M. CHRISTIANSEN

Under penalty of perjury, the undersigned attorney declares that the contents of the foregoing affidavit are true and correct to the best of her knowledge and belief.

Date: July 3, 2019

s/ Johanna M. Christiansen
JOHANNA M. CHRISTIANSEN

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UNITED STATES OF AMERICA, Plaintiff-Appellee, vs. RONALD H. VAN DEN HEUVEL, Defendant-Appellant.	Appeal from the United States District Court for the Eastern District of Wisconsin Case No. 17-CR-160 Hon. William C. Griesbach, United States District Judge, Presiding.
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NOTICE OF FILING AND PROOF OF SERVICE

TO: Mr. Gino Agnello, Clerk, United States Court of Appeals for the Seventh Circuit, 219 South Dearborn Street, Chicago, Illinois 60604

Mr. Ronald H. Van DenHeuvel, Reg. No. 15653-089, FPC Duluth, P.O. Box 1000, Duluth, Minnesota 55814

Mr. Matthew D. Krueger, Office of the United States Attorney, 205 Doty Street, Suite 301, Green Bay, Wisconsin 54301

I hereby certify that on July 3, 2019, I electronically filed the foregoing with the Clerk of Court for the United States Court of Appeals for the Seventh Circuit by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing documents by First Class Mail, postage prepaid, or have dispatched it

to a third party commercial carrier within three calendar days, to the non-CM/ECF participants.

s/ Johanna M. Christiansen
JOHANNA M. CHRISTIANSEN
Assistant Federal Public Defender
Office of the Federal Public Defender
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Peoria, Illinois 61602
Phone: (309) 671-7891
Email: Johanna_Christiansen@fd.org
COUNSEL FOR DEFENDANT