

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

UNITED STATES OF AMERICA,
Plaitiff,

v.

Case No. 19-CR-175

FRANCISCO MARTINEZ,
Defendant.

**DEFENDANT’S MOTION TO ADJOURN HEARING ON MOTIONS TO
SUPPRESS EVIDENCE**

Defendant, Francisco Martinez, by counsel, Edward J. Hunt, Hunt Law Group, S.C., moves the Court, Honorable William C. Griesbach, for an order adjourning the hearing on the defendant’s motions to suppress evidence currently scheduled for July 27, 2020 at 1:30 p.m.. In support of this motion, the defendant makes the following showing:

1. Counsel for the defendant has been advised by Government’s counsel that two law enforcement witnesses are traveling from states in

which there have been a high incidence of COVID-19 cases. There may be restrictions on travel.

2. The defendant and the Government are actively involved in negotiations which may lead to a resolution of this case short of trial. If a plea agreement is reached, there may not be the necessity for pre trial motion litigation.

3. Counsel for the Government has been made aware of this motion. The Government has no objections to the relief requested.

Accordingly, the defendant requests that the Court grant the motion to adjourn the hearing on the defendant's motions to suppress evidence.

Dated this 22nd of July, 2020.

Respectfully submitted:

s/Edward J. Hunt

By: Edward J. Hunt

Attorney for Francisco Martinez

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