

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

Case No. 19-CR-151

FRANCISCO MARTINEZ,  
Defendant.

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**DEFENDANT'S MOTION TO EXTEND THE TIME FOR FILING A  
RESPONSE BRIEF FOLLOWING SUPPRESSION MOTIONS HEARING**

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Defendant, Francisco Martinez, by counsel, Edward J. Hunt, Hunt Law Group, S.C., moves the Court, Honorable William C. Griesbach, for an order extending the time for filing a response brief following the hearing on the suppression motions by three days until Friday, September 25, 2020. In support of this motion, the defendant makes the following showing:

1 An evidentiary hearing was held on defendant's motions to suppress evidence on September 4, 2020. The government submitted a Brief in Support of Traffic Stops on September 15, 2020. It is counsel's understanding that the defendant would have seven days after the government submits its brief to submit a response brief.

2. Counsel has been exposed to the COVID-19 virus by an employee who tested positive for the virus. Counsel has been tested for the virus and fortunately he learned last week that he has tested negative for the virus. But for extended periods of time last week and the week before, he was out of the office and unable to work on projects out of an abundance of caution. In addition, he has not had full time support staff. Counsel therefore has fallen behind on a number of projects including his intention to complete and file a response brief following the suppression hearing by today's date.

Accordingly, the defendant requests that the Court grant this motion to extend the time to file a response brief following the suppression hearing by three days until Friday, September 25, 2020.

. Dated this 22nd of September, 2020.

Respectfully submitted,

**HUNT LAW GROUP, S.C.**

Electronically Signed by/s/Edward J. Hunt

Attorney for  
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