



3. At the time of the defendant's arraignment, the Court issued a Scheduling Order which required that all pre-trial motions be filed by June 15, 2011. Trial was set for July 15, 2011.

4. The parties have engaged in discussions regarding the production of the large volume of evidence developed by the Government during the course of the investigation. Disclosure of that information will begin in the next few days and the parties have discussed a proposed discovery order under which the Government would meet its production obligations by June 30, 2011.

5. In light of the large volume of discovery materials to be provided by the Government, both parties believe it is necessary to allow additional time for the filing of motions beyond the current deadline.

6. Moreover, because of the large volume of discovery material, the need to file pretrial motions and to properly prepare for trial, both parties seek the continuance of this matter from the July trial term.

7. The parties have met to discuss an appropriate schedule and to develop recommendations to the Court concerning deadlines for discovery, motions and for trial. As the result, the parties ask this Court to set a scheduling conference to address those issues and respectfully asks this Court to schedule such a conference during the weeks of June 13 or June 20.

8. Defendant Edwards stipulates that the ends of justice served by granting this extension outweigh the interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

WHEREFORE, the Government and the defendant respectfully request that:

1. The date by which the parties are to file motions be continued;

2. The trial date for this matter be continued;

3. This Court convene a scheduling conference during the weeks of either June 13 or June 20 for the purpose of discussing and implementing a scheduling plan for this matter.

4. This Court grant such further relief as it deems just and appropriate.

This the 10<sup>th</sup> day of June 2011.

GEORGE E.B. HOLDING  
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Acting under authority  
conferred by 28 U.S.C. § 515

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