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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

v.

Cesar Arce-Hernandez,
Defendant,

Case No. CR-17-00999-PHX-GMS

**MOTION TO CONTINUE TRIAL
(1st Request)**

**MOTION TO CONTINUE
PRETRIAL MOTIONS
DEADLINE
(1st Request)**

Defendant, Cesar Arce-Hernandez, through undersigned counsel, respectfully requests that the Court extend the time for filing of pretrial motions for a period of at least fourteen (60) days from the current deadline. Defendant also requests that the Court continue the trial date for a period of at least 60 days from the current date of September 6, 2017.

This request is made for the following reasons: Counsel for defendant needs additional time to receive and review discovery, conduct an investigation and to properly prepare this matter for trial.

Assistant U.S. Attorney Ryan Goldstein does not oppose this motion.

It is expected that excludable delay under Title 18 U.S.C. Section 3161 may occur as a result of this motion or from an order based thereon.

Respectfully submitted this 7 August 2017

/s/ Mark J. Andersen

Mark J. Andersen

I hereby certify that on August 7, 2017, I filed the original with the Clerk of the Court using the CM/ECF System for filing transmittal of a Notice of Electronic Filing to the following ECF registrants:

Email to chambers with copy and proposed order to:

The Honorable G Murray Snow
United States District Court
Sandra Day O'Connor U.S. Courthouse
401 West Washington Street
Phoenix, AZ 85003

By email:

Ryan Goldstein Ryan.Goldstein@usdoj.gov

/s/ Mark J. Andersen

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