### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)
	)
VS.	) CASE NO. 2:07cr95-WHA
	)
TERRANCE DEANDRE CAFFEY	)

# **UNOPPOSED MOTION TO CONTINUE**

Comes now Defendant Terrance Deandre Caffey, by and through counsel, and shows as follows:

1. This case is on this Court's August 6, 2007 trial docket.

2. On July 18, 2007, a superseding indictment was filed in this case. The superseding indictment added two counts additional counts relating to Defendant Caffey. These two additional counts are alleged to have arisen from events separate from the counts in the original indictment. The undersigned counsel just received discovery relating to the two new counts this morning. The superseding indictment also names as a defendant another individual who has not been apprehended.

3. Defendant Caffey needs additional time to investigate the two new counts in the superseding indictment and explore settlement options in this matter.

4. The undersigned counsel has discussed this matter with opposing counsel, Assistant United States Attorney Christa Deegan. Ms. Deegan has no objection to continuing the trial of this case to the next trial term.

5. Defendant Caffey will file a waiver of speedy trial.

WHEREFORE, Defendant Terrance Deandre Caffey moves this Court to continue the trial of this case to the next trial term.

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<u>s/ Thomas M. Goggans</u> Ala. State Bar No. 2222-S45-T 2030 East Second Street Montgomery AL 36106 PH: 334.834.2511 FX: 334.834.2512 e-mail: tgoggans@tgoggans.com

Attorney for Defendant Terrance Deandre Caffey

# **CERTIFICATE OF SERVICE**

I hereby certify that I have on this the 25<sup>th</sup> day of July, 2007, electronically filed the

foregoing with the Clerk of the Court using the CM/ECF system which will send notification of

such to the following: Christa D. Deegan, John T. Harmon.

# s/ Thomas M. Goggans

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