

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-60234-CR-ZLOCH/SNOW

UNITED STATES OF AMERICA, :

Plaintiff, :

vs. :

KARIN MARSHALL, :

Defendant. :

\_\_\_\_\_ /

**UNOPPOSED MOTION TO CONTINUE TRIAL**

Defendant, Karin Marshall, through counsel, respectfully moves for a continuance of her trial by a period of at least sixty (60) days, from the currently scheduled trial date of October 6, 2008, and in support states:

1. Defendant was arraigned on September 3, 2008, on 20 count indictment (plus a forfeiture count) charging wire fraud, in violation of 18 U.S.C. § 1343. Trial is currently set for October 6, 2008. This is the first trial setting in this matter.

2. Counsel has received the government's written response to the Standing Discovery Order, which includes approximately 800 pages of documents. Counsel needs additional time to review the discovery material with Ms. Marshall, and to conduct additional legal research and investigation, including locating and interviewing witnesses.

3. Additionally, counsel has a long planned and prepaid vacation overseas scheduled for October 7 - 19, 2008.

4. Counsel has contacted Marc Anton, the Assistant United States Attorney handling this matter for the government, who advised that the government has no objection to the granting of the requested relief.

5. The defendant understands that a continuance will toll her right to a speedy trial. She agrees that the requested continuance is necessary and has authorized counsel to request it on her behalf.

6. The defendant is currently on bond and has complied with all conditions of supervision.

WHEREFORE, the Defendant, Karin Marshall, through undersigned counsel, respectfully requests that the trial in this cause be continued by a period of at least sixty (60) days.

Respectfully submitted,

KATHLEEN M. WILLIAMS  
FEDERAL PUBLIC DEFENDER

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**CERTIFICATE OF SERVICE**

I HEREBY certify that on September 30, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

*s/Patrick M. Hunt*

Patrick M. Hunt

**SERVICE LIST**

**UNITED STATES OF AMERICA v. KARIN MARSHALL**

**Case No. 08-60234-CR-ZLOCH/SNOW**

**United States District Court, Southern District of Florida**

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