

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA		
V.		No. 3:12-CR-317-L
		No. 3:12-CR-413-L
BARRETT LANCASTER BROWN		No. 3:13-CR-030-L

UNOPPOSED MOTION TO CONTINUE SETENCING HEARING
AND MOTION TO CONTINUE TRIAL

The United States of America respectfully files this Unopposed Motion to Continue the Sentencing Hearing, and related deadlines, in causes 3:12-CR-317-L and 3:12-CR-413-L. After considering the scheduling conflicts of parties, the government requests the sentencing hearing be reset to either November 17, 2014, November 18, 2014, or any day during the weeks of November 24, 2014, December 1, 2014, or December 8, 2014. The defense does not oppose this request.

Brown currently is set for a sentencing hearing on October 6, 2014 in causes 3:12-CR-317-L and 3:12-CR-413-L. Brown is set for trial on October 27, 2014 in cause number 3:13-CR-030-L. However, pursuant to Brown's plea agreement in the 2012 cases, the government will move to dismiss Brown's indictment in the 2013 case when the court imposes the sentence on Brown for the 2012 cases. Thus the Government requests that this Honorable Court also continue the trial date in the 3:13-CR-030-L case, setting the trial a few weeks after the date selected for the sentencing hearing.

The requested continuance would provide for the efficient administration of justice,

and provide the parties the additional needed time to prepare, considering all of their scheduling conflicts. This request for a continuance is neither arbitrarily made nor made solely for the purposes of delay: It is made to ensure that the ends of justice are met.

Respectfully submitted,
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CERTIFICATE OF CONFERENCE

I hereby certify that on September 12 through 15, 2014, I communicated with Mr. Ghappour regarding this motion. After considering the conflicts of the government and the defense, Mr. Ghappour does not oppose the request for a continuance to the available dates mentioned in the motion.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2014, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing (ECF) system of the court. The ECF system sent a "Notice of Electronic Filing" to Brown's attorneys of record, who consented in writing to accept this Notice as service of this document by electronic means.

S/ Candina S. Heath
CANDINA S. HEATH
Assistant United States Attorney