

DAVID N. PARMENTER
Attorney at Law
53 S. Shilling
PO Box 700
Blackfoot, ID 83221
(208) 785-5618

Attorney for Defendant

U.S. COURTS
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CAMERON S. BURKE,
CLERK. IDAHO

UNITED STATES DISTRICT COURT
DISTRICT OF IDAHO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. CR-04-084-E- BLW
)	
vs.)	MOTION TO CONTINUE
)	
TROY HALL,)	
)	
Defendant.)	
)	
)	
)	
)	

COMES NOW the Defendant, by and through his attorney, DAVID N. PARMENTER, and moves the Court for an order continuing the trial herein on the following grounds and for the following reasons:

1. Mr. Parmenter was just appointed and became involved in this case in early May 2004, and has not had sufficient time to adequately prepare for trial. Further, counsel has received recently two separate groups of investigative reports and discovery, the last of which was just sent. The U.S. Attorney's Office advises that there are additional reports and discovery still to be sent out. Defendant has received some of the information, but because of his and defense

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counsel's schedule, they have not had adequate opportunity to review, discuss, and, as necessary, to adequately prepare for trial.

2. The U. S. Attorney's Office just recently filed the Indictment and the charges are new; the parties have not yet had an adequate opportunity to fully investigate and prepare for trial. The case is very involved, and the reports thus far detail numerous accounts of many different witnesses who would be adverse to Defendant or likely called by the government.

3. Defendant was just arraigned approximately one month ago, and Counsel just received a few days ago additional police reports and other investigative reports and documentation from the U. S. Attorney's Office. The defense requests and needs the additional time in order to review those documents, discuss them with potential witnesses, and adequately prepare for trial.

4. Assistant U. S. Attorney Mike Fica has advised that he agrees to the continuance. Further, no prior continuance has been sought or obtained.

5. Time for this continuance is excludable pursuant to 18 USC Section 3161(H)(8)(a), and so moves the Court. Defendant HALL would also suggest a continuance of at least 60 days, because of the nature of the case, in order to adequately review the discovery, prepare for trial, and subpoena any necessary witnesses.

DATED this 2nd of JUNE, 2004.



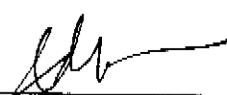
DAVID N. PARMENTER
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this 2nd day of JUNE, 2002 upon the following:

- Mail
- Fax
- Hand Delivery

Michael Fica, Assistant
U. S. Attorney
801 E. Sherman
Pocatello, ID 83201



DAVID N. PARMENTER