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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,)	
)	No. CR-04-0084-E-BLW
Plaintiff,)	
)	DEFENDANT HALL'S
vs.)	MOTION TO CONTINUE
)	TRIAL
TROY DEAN HALL, et al,)	
)	
Defendant.)	
)	

TROY DEAN HALL, by the undersigned counsel, respectfully moves that this court vacate and reschedule the trial setting of August 30, 2004. In support, Counsel states as follows:

1. Counsel was recently retained on August 3, 2004 by Mr. Hall to represent him in this case;
2. Counsel requires additional time to investigate Mr. Hall's case and prepare for trial;
3. Counsel has thus far received approximately 270 pages of discovery from his

client, who received said discovery from his previous counsel, including the grand jury testimony of the government's case agent, however, counsel has been advised by the government that additional grand jury testimony of several other witnesses is forthcoming;

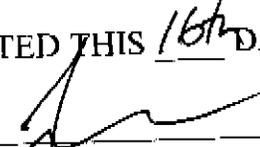
4. Counsel for the United States has advised the undersigned that the United States does not object to a continuance of the trial in this case;

5. This request is not made for the purpose of gaining a tactical advantage, nor is it made to vex the court or the government, nor is it made to intentionally delay these proceedings. Rather, this request is made for the sole purpose of affording Mr. Hall's newly retained counsel an adequate opportunity to prepare for trial in accordance with the requirements of the Sixth Amendment to the United States Constitution;

6. The interests of justice would be served by granting the relief prayed for herein.

WHEREFORE, Mr. Hall respectfully requests that this honorable court enter an Order vacating and rescheduling the August 30, 2004 trial date to a date no earlier than mid October, 2004, and further requests that the court find that Mr. Hall's interest in affording his counsel adequate opportunity to prepare for trial outweigh the public's interest in a speedy trial, and that the resultant delay is excludable time under the Speedy Trial Act.

RESPECTFULLY SUBMITTED THIS 16th DAY OF AUGUST, 2004.



Leo N. Griffard

Certificate of Service

I certify that a copy of this document was ___ mailed by first class postage prepaid at Boise, Idaho; faxed to _____; or ___ hand delivered to the following on this the 16th day of Aug., 2004:

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