

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

CASE NO. 3:06-cr-211(S2)-J-32HTS

v.

TONY HENDERSON

UNOPPOSED SECOND MOTION FOR ADDITIONAL TIME

The United States of America, by and through the undersigned Assistant United States Attorney, pursuant to the Court's inherent authority, hereby respectfully requests the Court enter an order granting the United States additional time, up to and including November 12, 2007, to respond to the defendant's motions, for the following reasons:

1. On October 2, 2007, the defendant was arraigned on the second superseding indictment. Doc. # 96. At that time, the Court ordered the defendant to file motions prompted by the superseding indictment by October 19, 2007, and ordered the United States to respond to such motions by October 26, 2007. Doc. ##s 96, 97. The defendant then filed motions seeking additional time to file its motions until October 29, 2007. Doc. ##s 98, 101. The Court granted these motions. Doc. ##s 99, 106.

2. On October 29, 2007, the defendant filed, in substance, a motion to sever and motion to dismiss. Doc. ##s 104, 105. The Court granted the undersigned's first motion for additional time to respond until November 9, 2007.

3. During the week of November 5, 2007, the undersigned has been working on response to these motions. In addition to working on these responses, the undersigned is also working on other assignments, which include serving as the duty attorney in the office this week. As a result, the undersigned is seeking a few more

days leave to respond to the motions. Mark Rosenblum, Esq., previously advised the undersigned that he does not oppose the undersigned's request for additional time.

WHEREFORE, the United States respectfully requests that the Court enter an order granting the United States additional time, up to and including November 12, 2007, to respond to the defendant's motions.

Respectfully Submitted,

ROBERT E. O'NEILL
United States Attorney

By: *s/ D. J. Pashayan*
D. J. PASHAYAN
Assistant United States Attorney
USAO No. 086
300 N. Hogan Street, Suite 700
Jacksonville, FL 32202
Phone: (904) 301-6300
Fax: (904) 301-6310
Email: Don.Pashayan@USDOJ.GOV

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 7, 2007, I electronically filed the foregoing with the Clerk of the Court by using CM/ECF system which will send a notice of electronic filing to the following:

Mark Rosenblum, Esq.

I HEREBY CERTIFY that on November 7, 2007, a true and correct copy of the foregoing document and the notice of electronic filing was sent via facsimile to the following non-CM/ECF participants:

None.

s/ D. J. Pashayan

D. J. PASHAYAN
Assistant United States Attorney