

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

---

3:90-CV-00104-DU  
3:75-CR-26-F

---

UNITED STATES OF AMERICA

V.

JEFFREY R. MacDONALD

MEMORANDUM IN SUPPORT OF RESPONSE OF THE UNITED STATES TO  
PETITIONER'S MOTION TO ADD AN ADDITIONAL PREDICATE TO HIS  
PREVIOUSLY FILED MOTION FOR RELIEF UNDER 28 U.S.C. § 2255, AND  
SUGGESTION IN THE ALTERNATIVE, TO TRANSFER TO THE COURT OF  
APPEALS

APPENDIX OF THE UNITED STATES

VOLUME IX

FRANK D. WHITNEY  
UNITED STATES ATTORNEY

BRIAN M. MURTAGH  
JOHN F. DE PUE  
Attorneys  
Criminal Division  
United States Department of Justice  
Washington, DC 20530

JOHN STUART BRUCE  
Executive Assistant United States Attorney  
310 New Bern Avenue  
Federal Building, Suite 800  
Raleigh, North Carolina 27601-1461  
Telephone: (919) 856-4530

April 13, 2006