

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
FILE NO. 75-CR-26-3-F  
FILE NO. 5:06-CV-23-F

UNITED STATES OF AMERICA	)	
	)	
v.	)	MOTION TO EXTEND JOINT
	)	SCHEDULE DEADLINE
JEFFREY MACDONALD,	)	
	)	
Movant.	)	

NOW COMES the Movant, by and through the undersigned counsel, who does hereby make this unopposed motion (with incorporated memorandum) to continue the September 10 deadline for the filing of the Joint Schedule to September 12.

In support of the motion, the Movant shows the following:

1. This court’s order of July 17 (DE 278) directed the parties to submit a Joint Schedule by September 10.

2. On September 4, attorney Chris Mumma filed a clarification of her Notice of Appearance to provide that she would not be appearing at the 2255 hearing scheduled to begin on September 17.

3. Counsel for the Movant has since obtained the assistance of attorney Keith Williams, who filed a Notice of Appearance earlier today.

4. Given the change in counsel, additional time is needed for the Movant to provide the materials required for the Joint Schedule. The Movant asks the court to extend the deadline from September 10 to September 12.

5. The Government does not object to the requested extension on condition that

the Movant provide to the Government by close of business Monday, September 10, 2012, the material required by Fed. R. Civ. P. 26(a)(2)(B) with respect to the expert the Movant is now proposing to call

WHEREFORE, the Movant requests that the court extend the Joint Schedule deadline from September 10 to September 12. A proposed order is submitted herewith.

This the 7th day of September, 2012.

RUDOLF, WIDENHOUSE, & FIALKO

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date shown below, he electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: Assistant United States Attorney John Bruce.

This the 7th day of September, 2012.

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