

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 16-334(1) (JNE/KMM)
	)	
Plaintiff,	)	
	)	<b>SECOND MOTION TO CONTINUE</b>
v.	)	<b>TRIAL AND EXCLUDE TIME</b>
	)	<b>UNDER THE SPEEDY TRIAL ACT</b>
PAUL R. HANSMEIER,	)	
	)	
Defendant.	)	

Paul R. Hansmeier, through counsel, Manny K. Atwal, moves this Court for a second continuance of the trial in the above-captioned matter. On August 10, 2017, the Court granted Mr. Hansmeier’s request to exclude time from the Speedy Trial Act computation through April 23, 2018 and continue the trial. Since that time, the parties have diligently worked to review and investigate the case. Counsel has been meeting with Mr. Hansmeier and reviewing thousands of pages of discovery. Mr. Hansmeier and the government are requesting that the trial be set for some-time in September 2018 rather than on March 12, 2018.

Counsel for Mr. Hansmeier needs additional time to investigate and prepare for trial. The discovery is voluminous and although counsel has been reviewing documents weekly, additional time is needed. Further, the government and counsel for Mr. Hansmeier both have upcoming trials that were scheduled prior to the March 12, 2018 trial date.

Mr. Hansmeier moves to exclude time from today’s date through November 2, 2018 from the Speedy Trial Act computations in this case. The parties submit that this case is “complex” within the meaning of to 18 U.S.C. § 3161(h)(7)(B)(ii) because of the

complicated nature of the case, the volume and the nature of the evidence; and the need to further investigate. Based on the complexity of the case, and upon the ground that the nature of the discovery in this case will require more time for the parties to review, a proposed order accompanies this motion. Granting this motion will serve the ends of justice such that the continuance will outweigh the best interest of the public and Mr. Hansmeier in a speedy trial. A signed Statement of Facts in Support of Exclusion of Time Under Speedy Trial Act will be filed separately from this motion.

Dated: February 16, 2018

Respectfully submitted,

*s/ Manny K. Atwal*

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