

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CR No. 2:10cr186-MHT
)	
RONALD GILLEY, et al.)	
)	
Defendants.)	

**DEFENDANT RONALD GILLEY'S MOTION TO STAY CONSIDERATION
OF DEFENDANT MILTON MCGREGOR'S FIRST MOTION TO DISMISS
REGARDING CHARGES PREMISED ON 18 U.S.C. § 666 AND SECOND
MOTION TO DISMISS REGARDING "HONEST SERVICES "CHARGES**

Defendant Ronald Gilley respectfully moves the Court to stay consideration of Mr. McGregor's First Motion to Dismiss Regarding Charges Premised on 18 U.S.C. § 666 (Docket Entry 206) and Second Motion to Dismiss Regarding "Honest Services" Charges (Docket Entry 208) pending filing of the other defendants' pre-trial motions on February 4, 2011.

It is well-established in this Circuit that district courts enjoy broad discretion in deciding how best to manage the cases before them. *Chudasama v. Mazda Motor Corp.*, 123 F.3d 1353, 1366-67 (11th Cir. 1997); *see In re Colonial BancGroup, Inc. Securities Litigation*, 2:09cv104-MHT, 2010 WL 119290 *1 (M.D.Ala. Jan. 7, 2010) ("a stay may be authorized simply as a means of controlling the district court's docket and of managing cases before the district court."). Pursuant to the Court's ruling on December 13, 2010, the parties have until February 4, 2011 to file pretrial motions, including dispositive motions similar to those previously filed by Mr. McGregor. Mr. Gilley contends that considerations of judicial economy and case management warrant consideration of the defendants' anticipated motions to dismiss to occur the same time. Specifically, Mr. Gilley anticipates that like Mr. McGregor, many, if not all, of the defendants

will move to dismiss the charges premised on 18 U.S.C. § 666 and the "honest services" charges. However, in addition to the extremely compelling points raised by Mr. McGregor, Mr. Gilley anticipates presenting the Court with additional arguments supporting the dismissal of these charges. Rather than running the risk of piecemeal rulings on these obviously important issues, Mr. Gilley deferentially maintains it is in the parties' interest and judicial economy that the related dispositive motions be considered at the same time after the February 4, 2011 filing deadline.

Respectfully submitted,

/s/ G. Douglas Jones
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CERTIFICATE OF SERVICE

I hereby certify that I have on this the 3rd day of January, 2011, filed the foregoing with the Clerk of Court via CM/ECF and an electronic copy of the same has been sent to the following:

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