

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

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

**MOTION TO EXTEND DEADLINE TO FILE MOTION TO SUPPRESS**  
**UNTIL FEBRUARY 11, 2011**

Comes now Defendant Ronald Gilley and respectfully requests this Court to grant him a brief extension of seven days until Friday, February 11, 2011 to file his Motion to Suppress All Evidence Consisting of, or Derived from, Intercepted Communications. As grounds in support of this Motion, Mr. Gilley states:

1. The original deadline for filing motions is Friday, February 4, 2011.
2. The Government has recently produced the following material information to Defendant Gilley:
  - a. On Friday, January 21, 2011, the Government provided 1500 pages of VoiceBox session history reports for non-pertinent calls.
  - b. On Monday, January 31, 2011, the Government provided 927 pages of VoiceBox session history reports for pertinent calls.
  - c. On Tuesday, February 1, 2011, the Government provided 97 pages of VoiceBox line sheets (including agent synopses) for privileged calls.

This information had been previously requested by Mr. Gilley in correspondence dated November 22, 2010 and in his Motion to Compel.

3. All of the above information is material and directly relevant to Mr. Gilley's analysis of whether the Government seized evidence beyond that authorized by the wiretap order(s) and whether the Government unreasonably executed the wiretap order. Specifically, all of this information provides specific information as to how such calls -including non-pertinent and privileged calls- were handled by the Government, including if such calls were monitored, how long such monitoring took place, if such calls were recorded, how many agents listened to the calls and if a synopsis of such call was done.

4. The Government's production, particularly the information produced this week, has placed an undue burden on Mr. Gilley to analyze and incorporate this material information into his anticipated Motion to Suppress. Likewise, such timing makes it difficult, if not impossible, for the undersigned to have substantive discussions with his consulting wiretap experts prior to the current filing deadlines.

5. Gilley is not asking for an extension of any deadlines with respect to the other motions due on February 4, 2011. The only extension sought is for the Motion to Suppress.

6. The Government has stated it opposes Mr. Gilley's request. Mr. Gilley, however, does not know of any prejudice the Government will suffer as a result of the requested one week extension, particularly given the large number of other motions that will be filed on February 4, 2011.

Respectfully submitted,

/s/ G. Douglas Jones  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this the 1<sup>st</sup> day of February, 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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