

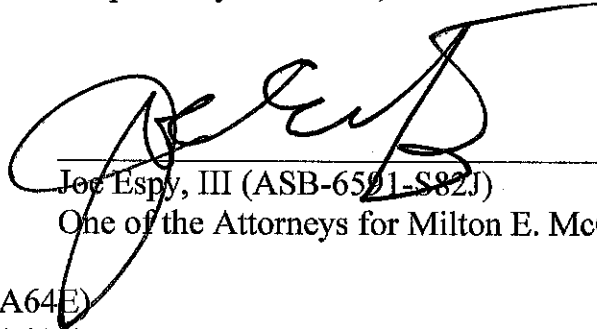
be made in advance of the time the evidence is offered in order to prevent prejudicial surprise and a possible mistrial.

3. Rule 404(b) entitles the defendant to reasonable notice, in advance of trial, of the nature of any such evidence the Government intends to introduce at trial.

4. In order to effectuate this right, and in order to avoid unnecessary delay, the Court should order the Government to provide such notice within fourteen (14) days.

5. The denial of this motion would deny the Defendant his right to the effective assistance of counsel and his right to prepare a defense as guaranteed by the Sixth Amendment to the Constitution of the United States.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following electronically and via regular mail, postage prepaid and properly addressed on this the 5 day of October, 2010.

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