

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

UNITED STATES OF AMERICA)
)
 v.) **CR NO 2:10-cr-186-MHT**
)
RONALD E. GILLEY)

UNITED STATES' MOTION TO CONTINUE SENTENCING

Comes now the United States of America, by and through the undersigned counsel, and moves this Court to continue sentencing in the above-styled case until on or after April 1, 2012, as grounds therefore says as follows:

1. On or about April 22, 2011, the defendant entered into a Plea Agreement with the United States. Pursuant to the Plea Agreement, the defendant has agreed to assist the United States by providing truthful information when called upon to do so by the United States. The United States has agreed to evaluate the defendant's assistance when it is complete and, if appropriate, make a recommendation to the Court concerning the defendant's sentence under Section 5K1.1 of the United States Sentencing Guidelines. The defendant has not yet been sentenced. Pursuant to this Court's order dated April 25, 2011 the defendant is scheduled to be sentenced on November 15, 2011.

2. The United States respectfully requests that the Court continue the defendant's sentencing until on or after April 1, 2012. The United States anticipates that the need for the defendant's cooperation will continue for the foreseeable future. As such, the United States believes that the requested continuance is necessary to properly evaluate the extent of the defendant's assistance as set forth in the Plea Agreement.

3. Counsel for the defendant supports the request for a continuance and have asked the United States to inform the Court of this fact in this motion.

For the foregoing reasons, the United States respectfully requests that the Court grant the United States' motion to continue sentencing in this matter.

Respectfully submitted this 21st day of September, 2011.

JACK SMITH
Chief, Public Integrity Section

/s/ Justin V. Shur
JUSTIN V. SHUR
Deputy Chief
Public Integrity Section
Criminal Division
U.S. Department of Justice
1400 New York Avenue, NW
Washington, DC 20005

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

Respectfully submitted,

JACK SMITH
Chief, Public Integrity Section

/s/ Justin V. Shur
JUSTIN V. SHUR
Deputy Chief
Public Integrity Section
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1400 New York Avenue, NW
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