

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :
 :
 :
 v. : CR. No. 1:09-MJ-11A
 :
 :
 ANTHONY M. ST. LAURENT, SR., :
 :

JOINT MOTION TO EXCLUDE CERTAIN TIME
UNDER THE SPEEDY TRIAL ACT

The United States, by and through its attorneys, Robert Clark Corrente, United States Attorney, and Scott Lawson, Department of Justice Trial Attorney, and defendant ANTHONY M. ST. LAURENT, SR., by and through his attorney, Olin W. Thompson, Esq., Assistant Federal Defender, move the Court to exclude the period February 25, 2009 through April 23, 2009 from the thirty day period within which an information or an indictment must be filed against the defendant pursuant to 18 U.S.C. § 3161(b). As grounds for this joint motion, the government and the defendant state as follows:

1. The government and the defendant are currently engaged in plea negotiations, which may lead to the prompt resolution of the charges filed by complaint in this matter, thereby conserving judicial resources.

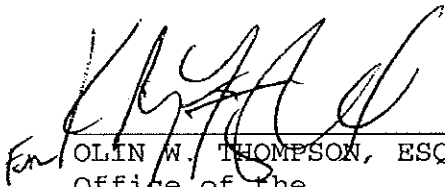
2. Counsel for the defendant has only recently entered his appearance, and counsel and the defendant therefore need additional time to discuss and consider a proposed plea agreement.

Accordingly, the ends of justice will be served by excluding the afore-mentioned time period, and such ends of justice outweigh the interest of the defendant and the public in a speedy indictment and/or trial. A proposed Order will be submitted to the Court.

Respectfully submitted,

ANTHONY M. ST. LAURENT, SR.,

By his Attorney,

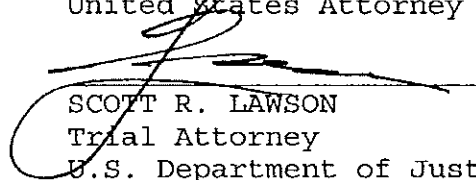


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Dated: February 26, 2009

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :
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 v. : CR. No. 1:09-MJ-11A
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 ANTHONY M. ST. LAURENT, SR., :
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ORDER

The United States and the defendant ANTHONY M. ST. LAURENT, SR., having moved this Court for an Order excluding the period February 25, 2009 through April 23, 2009 from the thirty day period within which an information or an indictment must be filed against the defendant pursuant to 18 U.S.C. § 3161(b);

IT IS THE FINDING OF THIS COURT that the ends of justice served by excluding the afore-mentioned time period outweigh the interest of the public and the defendant in a speedy trial, for the following reasons:

1. Plea negotiations currently are in progress, and both the United States and the defendant seek additional time to finalize the terms of a plea agreement.

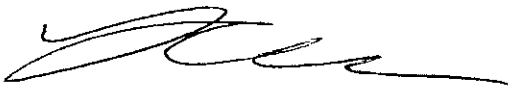
2. The defendant seeks additional time to discuss a proposed plea agreement with his attorney, and to consider such an agreement.

3. The filing of a plea agreement would likely result in a resolution of this matter on terms agreeable to the government, to the defendant and to the Court, and would eliminate the need for further pre-trial and trial proceedings, thereby conserving judicial resources.

WHEREFORE, it is on this 27th day of February, 2009;

ORDERED, that the period from February 25, 2009 through April 23, 2009 be excluded from the thirty day period within which an information or an indictment must be filed against the defendant pursuant to 18 U.S.C. § 3161(b).

Dated: February 27, 2009



Lincoln D. Almond
United States Magistrate Judge