

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

United States Of America,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	Case No. CR-14-318-M
	)	
Douglas G. Williams,	)	
	)	
Defendant.	)	

**DEFENDANT'S MOTION FOR CONTINUANCE**

Comes now Defendant, Douglas G. Williams, and respectfully requests this Honorable Court grant his Motion For Continuance based upon the following reasons, to--wit:

1. That on November 18, 2014, Defendant was arraigned before Magistrate Shon T. Erwin in the instant case.

2. That said Indictment alleges two (2) counts of Mail Fraud, three (3) counts of Witness Tampering and one (1) count of Criminal Forfeiture. (Filed November 13, 2014).

3. That the trial of said case is currently set on the January 13, 2015 trial docket of this Honorable Court.

4. That Defendant respectfully requests this Honorable Court grant his request for a continuance based upon the following reasons, to-wit:

A. That counsel for the United States of America and Defendant conducted a Discovery Conference on December 2, 2014 and filed their Joint Statement Of Discovery Conference on December 8, 2014.

B. That on the afternoon of December 22, 2014, counsel for Defendant received over Seven Thousand One Hundred (7,100) pages of

discovery materials including audio and video recordings from the United States of America.

C. Further, since the arraignment of Defendant, counsel for Defendant has been in preparation for a three (3) count Lewd Molestation trial in State of Oklahoma vs. Ronnie Joe McCauley, Jr., Case No. CF-12-133, Caddo County, State of Oklahoma. That said case proceeded to trial on December 8, 2014 before the Honorable Richard Van Dyck with Mr. Buzin as lead counsel.

D. That counsel for Defendant is currently in preparation for a First Degree Murder trial set for trial on January 26, 2015 in State of Oklahoma vs. Matthew Eugene Jackson, Case No. CF-12-258, Grady County, Oklahoma before the Honorable Richard Van Dyck. That Mr. Jackson is currently and has been incarcerated for the past ten (10) months.

5. That subject to approval of the court, the United States of America has no objection to said Motion.

6. That this is the first continuance request in this matter, said Motion is not made for purposes of delay or hindrance and no further requests are anticipated.

7. That attached hereto, Defendant has filed a waiver of his rights under the Speedy Trial Act that complies with 18 U.S.C.A. §3161(c)(1).

8. That in light of the above commitments of counsel and the volume of discovery recently received herein, Defendant respectfully submits the ends of justice would be best served by an

order continuing the trial of said Defendant to the June, 2015 trial docket.

9. That Defendant contends the need for this continuance outweighs the best interest of the public and the Defendant in a speedy trial. See 18 U.S.C. §3161(h)(7)(A). In particular, a continuance would not make a continuation of these proceedings impossible under Section 3161(h)(7)(B)(i) and would be fully consistent with the policies articulated in the remaining subsections of Section 3161(h)(7)(B).

Respectfully submitted,

s/Stephen H. Buzin  
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Certificate Of Mailing

I hereby certify a true and correct copy of Defendant's Motion For Continuance was sent by facsimile on the 24<sup>th</sup> day of December, 2014, to: 202.514.3003, Mark M. Angehr, United States Department Of Justice, and Brian K. Kidd, United States Department Of Justice, 1400 New York Ave., NW, Washington, D.C. 20005.

s/Stephen H. Buzin  
Stephen H. Buzin