

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 UNOPPOSED MOTION FOR CONTINUANCE**

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

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

2. That said Indictment alleges multiple counts of mail fraud, witness tampering and criminal forfeiture which have merited a substantial amount of time for diligent investigation and effective trial preparation.

3. That the trial of said case is currently set on the April 14, 2015, trial docket of this Honorable Court.

4. That on December 24, 2014, Defendant filed a Motion For Continuance which was granted in part and denied in part on January 5, 2015.

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

A. That counsel for Defendant has a long standing family

commitment which will require him to be out of the State of Oklahoma from April 16, 2015 until April 21, 2015.

B. That on 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. That on March 2, 2015, counsel for Defendant received an additional Four Hundred Twenty-Five (425) pages of discovery materials from the United States of America.

D. That on March 16, 2015, counsel for Defendant was advised by counsel for the United States of America a third discovery disclosure would be produced in the coming weeks.

E. Further, unexpectedly two (2) weeks ago, counsel for Defendant had knee surgery which has hampered his ability to ambulate and through the course of a recent physical, a prostrate issue has arisen requiring surgery on April 3, 2015.

5. That after consultation with counsel for the United State of American regarding all of the matters set forth herein, the United States of America has no objection to the granting of said Motion.

6. That the continuance request herein is not made for purposes of delay or hindrance and no further requests are anticipated.

7. That counsel for Defendant respectfully submits the ends of justice would be best served by an order continuing the trial of

said Defendant to the next 2015 trial docket of this Honorable Court.

8. 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 Unopposed Motion For Continuance was sent by facsimile on the 18<sup>th</sup> day of March, 2015, 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