

COMMONWEALTH OF PENNSYLVANIA

v.

GARY CHARLES SCHULTZ,
Defendant

: IN THE COURT OF COMMON PLEAS
: OF DAUPHIN COUNTY

:
: No. CP-22-CR-5164-2011

:
: CHARGES: PERJURY; PENALTIES
: FOR FAILURE TO REPORT

ORDER

And now, this _____ day of April, 2012, upon consideration of Defendant's Motion For Extension Of Time, IT IS ORDERED that defendant's motion is GRANTED and that defendant's Reply to the Commonwealth's Combined Answer shall be filed on May 4, 2012.

BY THE COURT:

TODD A. HOOVER, President Judge

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Thomas Farrell, Esquire
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DAUPHIN COUNTY
PENNSYLVANIA

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: IN THE COURT OF COMMON PLEAS
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MOTION BY DEFENDANT GARY C. SCHULTZ FOR AN EXTENSION OF TIME

AND NOW, come the defendant, Gary C. Schultz, by and through his attorney, Thomas J. Farrell, Esquire, and the law firm of Farrell & Reisinger, LLC, and respectfully requests the following:

1. On or about February 13, 2012, defendants filed Motions to Quash Count Two, a Petition for a Writ of Habeas Corpus as to Count One, and a Motion for a Bill of Particulars.

2. The Commonwealth filed a Combined Answer and Memorandum of Law in Opposition to the Motions on April 2, 2012. After a status conference on April 3, 2012, by order on April 5, 2012, the Court set a deadline of April 17, 2012, for defendant Curley to file a Reply to the Answer, and April 27, 2012, for defendant Schultz to file his Reply.

3. In the April 3, status conference, the Commonwealth represented that it would be producing substantial additional discovery to defendants within 7-10 days of the conference. Defendant Schultz predicated his request for an April 27 reply date on the need to review the discovery. However, the Commonwealth recently disclosed that the discovery is not ready and will not be produced until April 18, approximately one week after the initially projected disclosure date.

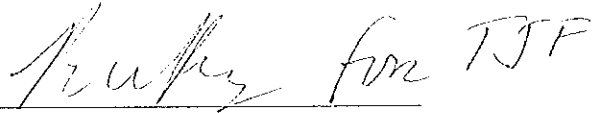
4. Therefore, defendant Schultz requests an extension of one week, to May 4 2012, to file his Reply.

WHEREFORE, defendant requests that his time to reply to the Commonwealth's

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Dmc

Combined Answer be extended to May 4, 2012.

Respectfully submitted,

Handwritten signature of Thomas J. Farrell, with the initials "TJF" written to the right of the signature.

Thomas J. Farrell, Esquire
Attorney for Defendant Gary C. Schultz
Pa. I.D. No. 48976
Farrell & Reisinger, LLC
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Pittsburgh, PA 15219
(412) 894-1380

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Motion for an Extension of Time was delivered by U.S. Mail and email, this 16th day of April, 2012, to the following:

Bruce Beemer
Deputy Attorney General
Office of the Attorney General
Strawberry Square
Harrisburg, PA 17120
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Attorney for Defendant Timothy M. Curley
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Thomas J. Farrell, Esquire
Attorney for Defendant, Gary C. Schultz