

IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA,

v.

TIMOTHY MARK CURLEY,

Defendant.

No. CP-22-CR-5165-2011

Charges: Perjury; Penalties for
Failure to Report or to Refer

COMMONWEALTH OF PENNSYLVANIA,

v.

GARY CHARLES SCHULTZ,

Defendant.

No. CP-22-CR-5164-2011

Charges: Perjury; Penalties for
Failure to Report or to Refer

MAY 31 2012

2012 MAY 31 AM 8:53

AND NOW THIS DATE

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS FOR DISCOVERY AND INSPECTION**

AND NOW, come the defendants, Timothy Mark Curley, by and through his attorney, Caroline M. Roberto, Esquire, and Gary Charles Schultz, by and through his attorney, Thomas J. Farrell, Esquire, and files the within Defendants' Unopposed Motion for Extension of Time to File Pre-Trial Motions for Discovery and Inspection and sets forth the following:

1. On April 5, 2012, this Court issued an Order which, at paragraph 3, required defendants Curley and Schultz to file Pre-Trial Motions for Discovery and Inspection on or before June 1, 2012.

2. On Friday, May 25, 2012, the Commonwealth provided counsel for the defendants with a discovery disk containing hundreds of pages of documents.

Counsel must first thoroughly review the newly provided documents in order to properly

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MAY 31 2012
COURT ADMINISTRATOR'S
OFFICE
DAUPHIN COUNTY

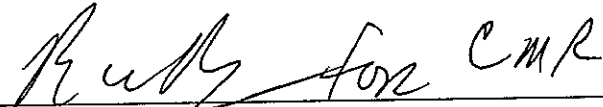
prepare a motion for discovery and inspection. An additional fourteen (14) days is needed to conduct the document review.

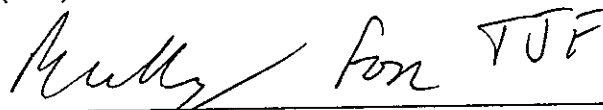
3. Counsel has discussed this matter with Deputy Attorney General Bruce Beemer, who has no objection to a fourteen (14) day extension of time.

4. For the reasons stated, defendants request an additional fourteen (14) days, or until June 15, 2012, to file their Motions for Discover and Inspection.

WHEREFORE, Defendants respectfully request this Honorable Court grant them an additional fourteen (14) days to file their Motions for Discovery and Inspection.

Respectfully submitted,

By: 
Caroline M. Roberto, Esquire
Attorney for Defendant, Timothy Mark Curley
Pa. I.D. No. 41524
429 4th Avenue, Suite 500
Pittsburgh, PA 15219
(412) 391-4071

By: 
Thomas J. Farrell, Esquire
Attorney for Defendant, Gary Charles Schultz
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IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA, :
 : No. CP-22-CR-5165-2011
 v. :
 : Charges: Perjury; Penalties for
TIMOTHY MARK CURLEY, : Failure to Report or to Refer
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 Defendant. :
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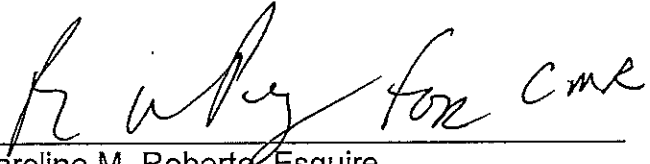
COMMONWEALTH OF PENNSYLVANIA, :
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GARY CHARLES SCHULTZ, : Failure to Report or to Refer
 :
 Defendant. :
 :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Defendants' Unopposed Motion for Extension of Time to File Pre-Trial Motions for Discovery and Inspection, was mailed and e-mailed, this 31st day of May, 2012, to the following:

Bruce Beemer
Deputy Attorney General
Office of the Attorney General
Strawberry Square
Harrisburg, PA 17120
bbeemer@attorneygeneral.gov

mailto:tfarrell@farellreisinger.com



Caroline M. Roberto, Esquire
Attorney for Defendant, Timothy Mark Curley

Docket entries which may be included in the website

Commonwealth v. Timothy M. Curley 5165 CR 2011

- ✓ April 4, 2012 Order of Court signed by Judge Barry Feudale
- ✓ April 17, 2012 Motion to Join Shultz Motion for Extension of Time
- ✓ April 18, 2012 Order Granting Motion to Join Shultz Motion for Extension of Time
- ✓ May 5, 2012 Defendant Curley's Reply to Commonwealth's Combined Answer and Memorandum of Law in Opposition to Defendant's Pre-Trial Motion, Section II
- May 13, 2012 Defendant's Unopposed Motion for Extension of Time to File Pre-Trial Motion for Discovery/Inspection
- June 1, 2012 Order Granting Motion for Extension of Time
- ✓ June 15, 2012 ^{Defendants} Motion for Discovery
- June 21, 2012 Order Scheduling Status Conference