

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

CRIMINAL NO. 07-103

VERSUS

SECTION "L" MAG. (5)

JAMES G. PERDIGAO

VIOLATION: 18 USC 1341,
1344, 2314, 1957 & 2, 26
USC 7201 & 7206 (1)

MOTION TO EXTEND DEADLINE FOR FILING PRE-TRIAL MOTIONS

NOW INTO COURT, through undersigned counsel, comes defendant James Perdigao who in an abundance of caution hereby moves the Court to extend the deadline for filing pre-trial motions. As of the date hereof, defendant has filed several pre-trial motions, including motions which challenge the sufficiency of various disclosures made by the government and motion for release of assets from seizure. The court's rulings on the multiple pending motions, coupled with perhaps supplemental disclosures, could engender additional motion practice. The evacuations and disruptions caused by hurricane season, as well as the continued pendency of the defendant's motion to reconsider the denial of the motion to recuse and request for evidentiary hearing, have caused unanticipated delays with normal scheduling and sequencing of motion practice. Defendant should therefore be permitted additional time to file pre-trial motions and requests that the court grant his motion to extend the deadline for filing pre-trial motions.

**WESSEL & ASSOCIATES
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/s/ William F. Wessel
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**ATTORNEYS FOR
DEFENDANT
JAMES PERDIGAO**

CERTIFICATE OF SERVICE

I hereby certify that on **September 26, 2008** I electronically filed the above and foregoing pleading with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to counsel registered with the court for receipt of pleadings by e-mail. I also certify that the foregoing and all attachments thereto have been served on all counsel of record by facsimile, electronic mail and/or by depositing same in the United States Mail, properly addressed and postage prepaid, this 26th day of September, 2008.

/s/ William F. Wessel
WILLIAM F. WESSEL (8551)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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**MEMORANDUM IN SUPPORT OF MOTION
TO EXTEND DEADLINE FOR FILING PRE-TRIAL MOTIONS**

MAY IT PLEASE THE COURT:

This memorandum is respectfully submitted by defendant James Perdigao, through undersigned counsel, in support of his motion to extend the deadline for filing pre-trial motions. As of the date hereof, defendant has filed several pre-trial motions, including motions which challenge the sufficiency of various disclosures made by the government and motion for release of assets from seizure. The court's rulings on the multiple pending motions, coupled with perhaps supplemental disclosures, could engender additional motion practice. The evacuations and disruptions caused by hurricane season, as well as the continued pendency of the defendant's motion to reconsider the denial of the motion to recuse and request for evidentiary hearing, have caused unanticipated delays with normal scheduling and sequencing of motion practice. In an abundance of caution, the defendant should therefore be permitted additional time to file pre-trial motions and requests that the court grant his motion to extend the deadline

for filing pre-trial motions. For these reasons, defendant respectfully requests that the deadline for filing pre-trial motions be extended in light of the foregoing.

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/s/ William F. Wessel

WILLIAM F. WESSEL (8551)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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NOTICE OF HEARING

To: James R. Mann, AUSA
U.S. Attorney's Office
Hale Boggs Building
500 Poydras Street, Suite B-210
New Orleans, LA 70130

PLEASE TAKE NOTICE that the Motion to Extend Deadline for Filing Pre-Trial Motions filed by defendant James Perdigao, through undersigned counsel, will be brought for hearing before the Honorable Eldon Fallon, United States District Judge, 500 Poydras Street, New Orleans, Louisiana 70130 at 2:00 p.m. on November 5, 2008, or at such other date and time as may be set by the court.

**WESSEL & ASSOCIATES
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**ATTORNEYS FOR
DEFENDANT
JAMES PERDIGAO**

CERTIFICATE OF SERVICE

I hereby certify that on **September 25, 2008** I electronically filed the Notice of Hearing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to counsel registered with the court for receipt of pleadings by e-mail. I also certify that the foregoing and all attachments thereto have been served on all counsel of record by facsimile, electronic mail and/or by depositing same in the United States Mail, properly addressed and postage prepaid, this 25th day of September, 2008.

/s/ William F. Wessel
WILLIAM F. WESSEL (8551)