

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America
v.

No. 1:15-CR-00012-01-SM

Panos Eliopoulos

ASSENTED-TO MOTION TO CONTINUE

NOW COMES the Defendant, Panos Eliopoulos, by and through counsel, and moves this Honorable Court to continue Jury Selection and Trial in this matter until a period after January 1, 2016, as the Court's docket permits. In support of this, the Defendant states as follows:

1. This matter is scheduled for Jury Selection on October 20, 2015, at 9:30 a.m., with the Trial occurring during the two-week period following Jury Selection.
2. At the last Final Pretrial Conference, the parties informed the Court that they had reached a global resolution to the cases against the Defendants, including Katie Eliopoulos.
3. The parties agreed to continue the matter for 30 days to allow time for the preparation, review, and filing of plea agreement in this matter. If the Defendant had pled guilty, the Government was going to dismiss the case against his wife, Katie Eliopoulos.
4. Since that time, the Defendant, Panos Eliopoulos, changed his mind about pleading guilty and would like to proceed to trial in this matter.
5. Upon information and belief, without a global resolution, Katie Eliopoulos will also proceed to trial.
6. Counsel for Panos Eliopoulos has several major trials scheduled for the remainder of 2015: Jury Selection October 26, 2015, State v. Davis, Rockingham County Superior Court, Aggravated Felonious Sexual Assault; Jury Selection/Trial November 9/16, 2015, State v. Pratt,

Cheshire County Superior Court, Arson and Insurance Fraud; Final Pretrial December 3, 2015, Jury Selection/Trial Week December 14, 2015, State v. Thompson, Rockingham County Superior Court, Robbery. All of these cases will require extensive preparation and the trials are each likely to last at least one week.

7. Counsel for the Government has also indicated that her trial schedule for the fall will make it difficult as well for the Government to try this case in the fall.

8. As this matter is surely proceeding to trial, and considering counsels' trial schedule, and the parties request that this Court continue the matter until a period after January 1, 2016.

9. Counsel for the Defendant has contacted Assistant United States Attorney Jennifer Davis who assents to the relief requested in this motion.

10. Counsel for the Defendant has contacted Jonathan Saxe, Esquire, counsel for the co-defendant, Katie Eliopoulos, who assents to the relief requested in this motion.

11. The Defendant will submit a Waiver of Speedy Trial following this motion.

WHEREFORE, the Defendant prays for the following relief:

A. To continue Jury Selection/Trial until a period after January 1, 2016, as the Court's docket permits;

B. For such other relief the Court deems equitable and just.

Respectfully submitted,

Panos Eliopoulos
By his attorneys,

WILSON, BUSH, DURKIN & KEEFE

Dated: October 5, 2015

/s/ Charles J. Keefe

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Assented-to Motion to Continue was this date forwarded to Jennifer Davis, Esquire, Assistant U.S. Attorney, and to Jonathan Saxe, Esquire.

Dated: October 5, 2015

/s/ Charles J. Keefe

Charles J. Keefe

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