IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

CASE NO. 24-cr-00113-NYW

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. **JON M. HALLFORD**,
2. **CARIE L. HALLFORD,**

Defendants.

JOINT MOTION TO CONTINUE MOTIONS DEADLINE

Jon M. Hallford and Carie L. Hallford, through their respective attorneys, Laura H. Suelau and Chaz Melihercik, and the government, through Assistant United States Attorneys Tim Neff and Craig Fansler, respectfully move this Court to continue and reset the deadline for Pretrial Motions from August 30 to September 13, 2024. In support of this Motion, the parties state:

1. Trial in this matter is presently set to proceed October 15, 2024, and pretrial motions are due August 30, 2024.

2. The parties are in the process of negotiating a plea agreement and believe there is a high likelihood this matter will be resolved by such an agreement.

3. The parties each have individual tasks that must be completed before reaching a final agreement. Counsel for the Hallfords, for example, are continuing to diligently review voluminous discovery, confer with and advise their clients, and communicate with the Hallfords' respective attorneys in El Paso County. Likewise, counsel for the government must confer with the alleged victims in this case.

4. Should this matter not result in a disposition, the parties will require additional time to prepare for trial. In either case, the parties do not anticipate proceeding to trial on October 15, 2024.

5. Counsel for the Hallfords and the government do not reasonably believe that they will be able to either reach a disposition or determine how much additional time is necessary to prepare for trial, on or before August 30, 2024.

6. In addition to the tasks outstanding, counsel for Mr. Hallford is on leave August 30, 2024. That leave was planned before her appointment in this case.

7. Counsel for the parties reasonably believe they can file a Notice of Disposition or, less likely, a Motion for an Ends of Justice continuance, on or before September 13, 2024.

8. For the foregoing reasons, the parties respectfully request this Court continue the deadline for filing pretrial motions by two weeks, to September 13, 2024.

Respectfully submitted,

VIRGINIA L. GRADY
Federal Public Defender

s/ Laura H. Suelau
LAURA H. SUELAU
Assistant Federal Public Defender
633 17th Street, Suite 1000
Denver, CO 80202
Telephone: (303) 294-7002
FAX: (303) 294-1192
laura_suelau@fd.org
Attorney for Defendant Jon Hallford

MELIHERCIK LAW, LLC

s/ Robert C. Melihercik
ROBERT CHARLES MELIHERCIK
7765 Wadsworth Blvd., Suite 746327
Arvada, CO 80006
Telephone: (720) 707-2854
chaz@melihercik law.com
Attorney for Defendant Carie Hallford

COLE FINEGAN
UNITED STATES ATTORNEY

By: s/ Tim Neff
TIM R. NEFF
Assistant U.S. Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, CO 80202
Telephone: (303) 454-0200
tim.neff@usdoj.gov
Attorney for Government

COLE FINEGAN
UNITED STATES ATTORNEY

By: s/ Craig Fansler
CRAIG G. FANSLER
Assistant U.S. Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, CO 80202
Telephone: (303) 454-0100
craig.fansler2@usdoj.gov
Attorney for Government

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2024, I filed the foregoing ***Joint Motion to Continue Motions Deadline*** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following email addresses:

Craig Fansler, Assistant United States Attorney
Email: craig.fansler2@usdoj.gov

Tim Neff, Assistant United States Attorney
Email: tim.neff@usdoj.gov

Robert C. Melihercik
Email: chaz@melihercriklaw.com
Attorney for Carie Hallford

I hereby certify that I have mailed or served the document or paper to the following participant in the manner (mail, hand-delivery, etc.) indicated next to the participant's name:

Jon M. Hallford (via U.S. Mail)

s/ Laura H. Suelau
LAURA H. SUELAU
Assistant Federal Public Defender
633 17th Street, Suite 1000
Denver, CO 80202
Telephone: (303) 294-7002
FAX: (303) 294-1192
laura_suelau@fd.org
Attorney for Defendant Jon Hallford