

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Criminal No. 4:16-cr-031
	)	
v.	)	
	)	
KEVIN ARIEL TOALA RAMIREZ,	)	DEFENDANT’S MOTION TO
a/k/a “Kevin Rechsteiner,”	)	CONTINUE TRIAL AND
	)	PRETRIAL DEADLINES
Defendant.	)	

Defendant Kevin Ariel Toala Ramirez, through counsel, moves for a continuance of the trial currently scheduled for August 1, 2016, and an extension of the deadline for filing pretrial motions. In support of this motion, counsel states as follows:

1. The defendant is charged in a three-count indictment with travel with intent to engage in illicit sexual conduct in violation of 18 U.S.C. §2423(b), transportation with intent to engage in criminal sexual activity in violation of 18 U.S.C. §2423(a) and possession of child pornography in violation of 18 U.S.C. §§2252(a)(4)(B) and 2252(b)(2).
2. More time will be needed to investigate and negotiate a settlement in this case.
3. The government has indicated that it does not resist this motion.
4. Because the ends of justice served by granting this continuance outweigh the best interest of the public and the defendant in a speedy trial, the period would be excludable time for speedy trial purposes.
5. The defendant has been detained.
6. Trial in this matter has not previously been continued. This is the first motion to

continue trial filed in this case.

WHEREFORE, defendant Kevin Ariel Toala Ramirez respectfully requests a continuance of the current trial date of August 1, 2016, and an extension of the deadline for filing pretrial motions.

Respectfully Submitted,

/s/ B. John Burns

B. John Burns, Asst. Federal Defender
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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2016, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

/s/ Morgan Conn, Paralegal