

**IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND**

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STATE OF MARYLAND :  
v. :  
SHEILA ANN DIXON :  
-----X

Case No. 109210015

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**MOTION FOR EXTENSION OF TIME  
TO FILE PRETRIAL MOTIONS**

Sheila A. Dixon, defendant, by her undersigned counsel, and pursuant to Maryland Rule 4-252(b), respectfully requests an extension of time within which to file pretrial motions, and in support of her motion submits the following:

At a hearing before the Court on August 5, 2009, the parties agreed to a trial schedule which requires the defendant to submit any pretrial motions on or before September 8, 2009. That agreement was adopted by the Court in an Order issued August 6, 2009. At the time the scheduling Order was established, the State Prosecutor advised the Court that he intended to continue his practice of providing "open file" discovery to the defense to prepare for trial.

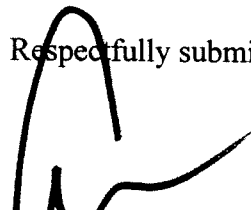
As the Court is aware, shortly after the scheduling conference the defense requested that the State provide certain discovery to prepare for trial. Among the materials sought by the defendant were copies of all grand jury subpoenas issued since the original indictment was returned in this case in January 2009. To date the State has refused to provide the discovery, which has prompted a pending Motion to Compel Discovery.

Should the Court grant the defendant's Motion to Compel and direct the State to produce the additional discovery, the defendant will need additional time to review the discovery, conduct further factual investigation, and prepare additional motions based upon such

information. Rule 4-252(b) of the Maryland Rules of Criminal Procedure provides that a defendant is entitled to an additional five (5) days from the receipt of discovery to submit any new motions based upon such information. The defendant respectfully requests that the Court grant the defendant an additional seven (7) days from the date of receipt of any new discovery to file any such motions.

WEHREFORE, for the foregoing reasons, the defendant urges the Court to grant her additional time within which to file pretrial motions.

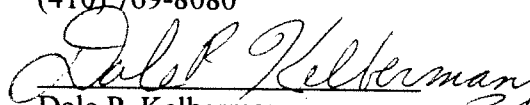
Respectfully submitted,



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Jeffrey Nusinov

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September 8, 2009

*Attorneys for Defendant Sheila A. Dixon*

**CERTIFICATE OF SERVICE**

I hereby certify this 8<sup>th</sup> day of September, 2009, that a copy of the foregoing Motion for Extension of Time was sent by electronic and regular mail to Robert Rohrbaugh, Esq., Office of the State Prosecutor, Towson, Maryland.



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Arnold M. Weiner