

MILES & STOCKBRIDGE P.C.

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December 4, 2009

**VIA HAND-DELIVERY**

Marian Soto, Criminal Clerk Manager  
Circuit Court for Baltimore City  
Clarence M. Mitchell, Jr. Courthouse  
100 N. Calvert St., Room 200  
Baltimore, MD 21202

Re: *State of Maryland v. Sheila A. Dixon*  
Case No. 109210015

Dear Ms. Soto:

Enclosed herewith please find *Defendant's Motion for Extension of Time to File Motion for New Trial* to be filed in the above-referenced case.

Thank you for your attention with respect to this matter.

Very truly yours,



Dale P. Kelberman

DPK/klf  
Enclosure

cc: Hon. Dennis M. Sweeney  
Robert A. Rohrbaugh, State Prosecutor  
Thomas M. McDonough, Deputy State Prosecutor  
Arnold M. Weiner, Esquire

IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND

\*

\*

CASE NOS. 109210015  
109210016

v.

\*

SHEILA ANN DIXON

\*

\* \* \* \* \*

**MOTION FOR EXTENSION OF TIME  
TO FILE MOTION FOR NEW TRIAL**

Sheila A. Dixon, defendant, by her undersigned counsel, and pursuant to Maryland Rules 1-204 and 4-331, respectfully requests an extension of time within which to file a Motion for a New Trial, and in support of her motion submits the following:

After a jury deliberated for seven days, on December 1, 2009, the jury in the above matter found the Defendant guilty of Count Four of the Indictment, acquitted her of three other counts, and was unable to reach a unanimous verdict on Count Six.

Pursuant to Maryland Rule 4-331, the Defendant has ten (10) days from the date of the verdict to file a Motion for a New Trial. The Motion is therefore presently due to be filed on or before December 11, 2009. Under Maryland Rule 1-204, the Court has the authority to grant an extension of time for the filing of such Motion.

The Defendant needs additional time to prepare her Motion, and to obtain certain transcripts of testimony and other evidence in support of said Motion. The Defendant requests an additional ten (10) days, until December 20, 2009 to file said Motion. Granting the additional

time will not prejudice the State, and the Defendant has no objection to granting the State an equivalent extension to file its response. The State opposes this request.

WHEREFORE, for the foregoing reasons, the defendant urges the Court to grant her an additional ten (10) days, until December 20, 2009, within which to file her Motion for a New Trial.

Respectfully submitted,



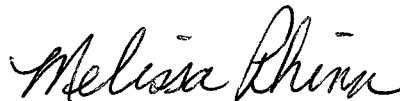
Arnold M. Weiner  
Barry Gogel  
Norman Smith  
Jeffrey Nusinov

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Melissa Phinn  
Law Offices of Melissa Phinn

December 4, 2009

*Attorneys for Defendant Sheila A. Dixon*

## CERTIFICATE OF SERVICE

I hereby certify this 4<sup>th</sup> day of December, 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.

A handwritten signature in black ink that reads "Dale P. Kelberman". The signature is written in a cursive style with a horizontal line underneath the name.

Dale P. Kelberman