

STATE OF MARYLAND

*

IN THE CIRCUIT COURT

*

OF MARYLAND

v.

*

FOR

HELEN L. HOLTON

*

BALTIMORE CITY

Defendant

*

Case No.: 109209024

* * * * *

MOTION FOR EXTENSION OF TIME TO FILE BILL OF PARTICULARS

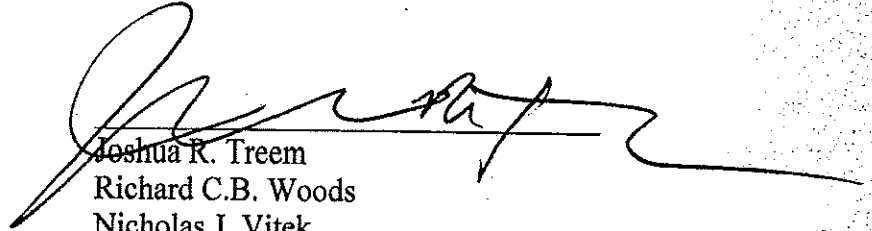
Helen L. Holton, Defendant, by her attorneys, Joshua R. Treem, Richard C.B. Woods, Nicholas J. Vitek and Schulman, Treem, Kaminkow & Gilden, P.A., and by agreement of the State, files this Motion for Extension of Time to File Bill of Particulars pursuant to Md. Rule 2-241 and states:

1. Counsel for Ms. Holton entered their appearance on August 12, 2009.
2. Ms. Holton’s initial appearance is scheduled for September 2, 2009.
3. Pursuant to Md. Rule 2-241, a Bill of Particulars must be filed within 15 days after the earlier of the appearance of counsel or the first appearance of the defendant before the Court, i.e. August 27, 2009
4. A scheduling conference has been docketed for September 2, 2009 at which time the calendar for motions and trial will be set.
5. As yet no discovery has been requested nor supplied, which may make a request for a Bill of Particulars unnecessary.
6. The State has no objection to Ms. Holton’s request for an extension of time to file her Bill of Particulars.

WHEREFORE, the Defendant, Helen L. Holton, requests this Honorable Court grant

her Motion for Extension of Time to File Bill of Particulars to a future date set by this Court.

Respectfully Submitted,

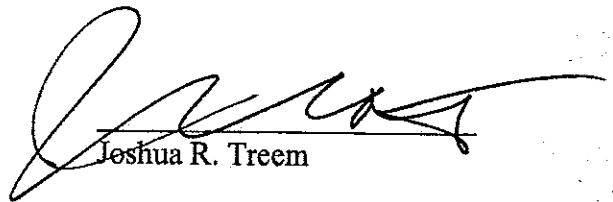


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of August, 2009, a copy of the foregoing *Motion for Extension of Time to File Bill of Particulars* was sent via first class mail, postage paid to:

Robert Rohrbaugh, State Prosecutor
Thomas M. McDonough, Deputy State Prosecutor
Hampton Plaza, Suite 410,
300 East Joppa Road,
Towson, Maryland 21286-3152



Joshua R. Treem

