

3. The government and the defendant are presently engaged in negotiations in this case and are discussing the possible pre-indictment disposition of the charged offense.

4. The defendant is currently housed in FCI Fairton. Difficulties in scheduling the defendant for a meeting in Philadelphia with defense counsel and counsel for the government have dictated a meeting on May 21, 1999 at 10 A.M.

5. The government and counsel for the defense wish to have the opportunity to meet with the defendant prior to resolving this case before indictment. In order to do so, a continuance of the deadline for filing an indictment or information must be granted.

6. The last date on or before which the government must file an indictment or information charging the defendant, pursuant to 18 U.S.C. § 3161(b) is May 16, 1999.

7. Mr. Leigh Skipper of the Federal Defender's office, who represents Mr. Stratton, stated on May 5, 1999, that he concurs in the government's request for a continuance.

WHEREFORE, it is respectfully submitted by the government that the needs of justice will best be served by a continuance in this matter for a period of thirty (30) days

eyond the last date required for the filing of an Information or
Indictment under the Speedy Trial Act.

Respectfully submitted,

MICHAEL R. STILES
United States Attorney

RICHARD A. LLORET
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and
correct copy of the foregoing to be served by first-class United
States mail, postage prepaid, and by fax, upon the following:

LEIGH SKIPPER, ESQ.
437 Chestnut Street, Suite 800
Philadelphia, PA 19106

RICHARD A. LLORET
Assistant United States Attorney

Dated: August 11, 2003