

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA	§	
	§	
V.	§	SA-18-CR-00390 - OLG
	§	
ROBERT MIKELL USSERY,	§	
	§	
	§	
Defendant	§	

**DEFENDANT’S MOTION FOR CONTINUANCE
OF MOTIONS HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW counsel for ROBERT MIKELL USSERY, the Defendant in the above styled and numbered cause, and files this Defendant’s *Motion for Continuance of Motions Hearing* and for Good Cause and in support thereof would show this Honorable Court the following:

1. This matter is set for Motions Hearing on June 22, 2022, at 09:20 A.M., ECF Docket No. 195;
2. Undersigned counsel (“Counsel”) is CJA Court Appointed in this matter and files this his *Motion for Continuance of Motions Hearing*;
3. Undersigned Counsel will be in Jury Trial, Del Rio Division, Western District of Texas, in USA vs. Roberto Galeas-Mejia, DR 19 CR 01510, and trial commencing on Tuesday, June 21, 2022, ECF Docket No. 348;

4. Counsel respectfully requests a Continuance of the Motions Hearing in the above styled and numbered cause;
5. Further, undersigned counsel has communicated to the courtroom deputy for Your Honor, ORLANDO L. GARCIA, the AUSA counsel for the government and counsel representing codefendant Mann the fact and circumstance of the herein motion;
6. Defendant USSERY defers to this court regarding the matter and timing of a Motions Hearing;
7. Defendant does request, respectfully, a Continuance of at least 60 days; and
8. This motion is not sought for purposes of undue delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the undersigned Counsel respectfully prays that this motion be Granted and that this matter be herein Continued to a date and time deemed appropriate by this Honorable Court.

Respectfully Submitted,

/s/ Thomas Joseph McHugh

THOMAS JOSEPH MCHUGH

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STATE BAR NO. 13675000

ATTORNEY FOR ROBERT MIKELL USSERY

CERTIFICATE OF SERVICE

I hereby certify that on the 18st day of June, 2022, I electronically filed the foregoing Motion with the Clerk of Court using the CM/ECF system which will send notification of such filing to Karina O’Daniel, Assistant United States Attorneys, 601 N.W. Loop 410, Suite 600, San Antonio, Texas 78216, and a copy will be sent by Hand-Delivery to Defendant Robert Mikell Ussery.

/s/ Thomas Joseph McHugh
THOMAS JOSEPH MCHUGH

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ORDER

On this date this Court came on to be considered the Defendant’s Motion for Continuance of Motions Gearing and after considering same, is of the opinion and does so find that the Defendant’s Motion is well taken and should be in all respects GRANTED.

IT IS THEREFORE ORDERED, ADJUDGED and DECREED that the Motions Hearing shall be continued until ____ day of _____, 2022.

SIGNED THIS _____ day of June, 2022.

ORLANDO GARCIA
CHIEF UNITED STATES DISTRICT JUDGE