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Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

PLAINTIFF,

vs.

JUSTIN JAMES RECTOR,

DEFENDANT.

Case No. CR 2014-01193

**DEFENSE MOTION EXTENDING TIME
TO FILE RULE 12.9 MOTION**

(ASSIGNED TO THE HON. LEE JANTZEN)

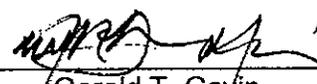
COMES NOW the defendant Justin James Rector, by and through undersigned counsel, and moves that the time for filing a motion pursuant to Arizona Rule of Criminal Procedure 12.9 be extended beyond the provided period from the [date] filing of the Grand Jury transcript and minutes. *The Defendant concedes the proper time for filing such a motion has long passed; new, undersigned counsel files this the same day as his Notice of Appearance on this case, and urges this motion given the draconian punishment possible in this case, and counsel's inability to request this relief at an earlier time...this being his first opportunity to do so.*

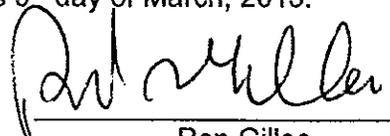
Portions of the initial discovery in this cause have yet to be provided to counsel from previous defense counsel, and time is needed to review the Grand Jury



1 transcript. Undersigned counsel cannot determine now, without obtaining and analysis
2 of said items, whether there is a basis for a motion to remand under Rule 12.9(b). To
3 not permit this extension on this case invites an ineffective assistance or other Rule 32
4 claim later, against either previous or current counsel. It is in the interest of justice and
5 judicial economy. Defendant respectfully requests this court enter an order extending
6 the time for filing a "Motion for Rule 12.9 New Finding of Probable Cause" for a period of
7 30 days from the court's entering of an Order permitting same.
8

9 RESPECTFULLY SUBMITTED This 9th day of March, 2015.

10
11 BY: 
12 Gerald T. Gayin
13 Defendant's Co-Counsel


14 Ron Gileo
15 Defendant's Co-Counsel

1 ORIGINAL FILED this 9th day of March, 2015
2 To:

3 Clerk of the Court
4 401 E Spring Street
5 Kingman Arizona 86401

6 And copies hand-delivered this
7 Same date to:

8 Honorable Lee Jantzen
9 Judge of the Superior Court
10 Mohave County Courthouse
11 401 E Spring Street
12 Kingman Arizona 86401

13 Greg McPhillips
14 Assigned Deputy Mohave County Attorney
15 PO Box 7000
16 Kingman Arizona 86401

17 Ron Gilleo
18 Mohave County Legal Defender
19 Co-Counsel for Defendant
20 313 Pine Street
21 PO Box 7000
22 Kingman Arizona 86401

23 Client

24 File

25 By: _____
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