

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ROBERT ALAN SOLOWAY,)
)
Defendant.)
)

NO. CR07-187MJP
**STIPULATION CONTINUING
MOTIONS FILING DEADLINE
AND TRIAL DATE**

Plaintiff United States of America and defendant ROBERT ALAN SOLOWAY, by and through their respective undersigned counsel of record, hereby stipulate and agree to continue the motions filing deadline from June 20, 2007, to December 3, 2007, and the trial date from August 6, 2007, to January 7, 2008. This continuance is requested, and required in the interest of justice, for the following reasons.

Defendant Robert Soloway is charged in a 35 count indictment that was returned on May 23, 2007. Charges include mail fraud, wire fraud, fraud in connection with electronic mail, aggravated identity theft, and money laundering. Mr. Soloway was arrested on May 30, 2007, and his present counsel entered an appearance in this case on June 7, 2007. A detention hearing was held on June 13, 2007, and Mr. Soloway was ordered detained pending trial.

STIPULATION CONTINUING MOTIONS
FILING DEADLINE AND TRIAL DATE;
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1 Discovery in this case is voluminous, and includes tens of thousands of pages of
2 documents, bank records, credit card records, ledgers, computer files, emails, and other
3 items. Many of these records go back more than four years. Given the brevity of time
4 and the sheer volume of the material, defense counsel has not yet been able to review all
5 of the discovery materials. Moreover, counsel for the government and Mr. Soloway are
6 still in the process of determining what format to copy these materials so that Mr. Soloway
7 will have access to them and can assist his counsel in his defense. Accordingly, defense
8 counsel is not in a position to determine what pretrial motions may be appropriate, nor can
9 he be adequately prepared for trial by the presently scheduled trial date of August 6, 2007.
10

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12 The parties agree that a continuance of the motions filing deadline and the trial date
13 are necessary pursuant to 18 U.S.C. §§3161(h)(8)(A), (B)(i), (B)(ii) and (B)(iv); that the
14 ends of justice served by granting the requested continuance outweigh the best interest of
15 the public and the defendant in a speedy trial; and that the period of delay resulting from
16 this continuance shall be excluded in computing the time within which the trial of this
17 matter must commence.
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19 The parties request a continuance of the motions filing deadline from June 20,
20 2007, to December 3, 2007, and of the trial date from August 6, 2007, to January 7,
21 2008. There have been no prior requests for a continuance. Contemporaneous with the
22 filing of this Stipulation, Defendant is filing a Waiver of Speedy Trial through January 31,
23 2008.
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25
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27

1 DATED this 20th day of July, 2007.

2 RICHARD J. TROBERMAN, P.S.

3
4 By: 

5 RICHARD J. TROBERMAN

6 WSBA #6879

7 Attorney for Defendant

8 Robert Alan Soloway

9 JEFFREY C. SULLIVAN

10 United States Attorney

11 *PER TELEPHONE*

12 By: 

13 KATHRYN A. WARMA

14 Assistant U.S. Attorney

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28 STIPULATION CONTINUING MOTIONS
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