

Neal A. Puckett, Esq.
Lic: VA

Haytham Faraj, Esq.
Lic: IL, MI, DC



Eric S. Montalvo, Esq.
Lic: NJ, PA, DC

Debra A. D'Agostino, Esq.
Lic: NY

THE LAW FIRM OF PUCKETT AND FARAJ, PC

February 04, 2011

Via email

LtCol Thomas J. Sanzi, USMC
Military Judge
Western Judicial Circuit
Building 22161
Camp Pendleton, CA 92055

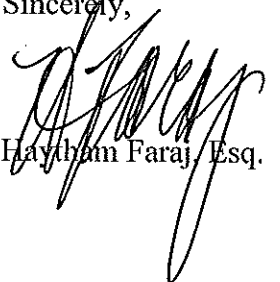
Re: United States v. Maj Edward T. Card Jr.; Request for delay

Dear LtCol Sanzi,

I represent Maj Edward Card in the subject case. The defense requests a delay of the Article 32 investigation from February 15, 2011 until April 5, 2011. The reason the delay is requested is because of the voluminous discovery, consisting of several hundred pages, and counsel's trial schedule. I am currently scheduled for a court-martial in late February and into March and a Federal trial in mid March. The first full week of April is the first possible period to conduct this Article 32 while allowing the defense sufficient time to review the discovery provided.

The defense has consulted with the trial counsel who has agreed to the requested delay. The defense agrees that the period of February 15 – April 5 shall be excludable delay under R.C.M. 707.

Sincerely,



Haytham Faraj, Esq.

Copy to:
Trial counsel
Detailed Defense Counsel-Maj Workman
Client
File