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WRITER'S DIRECT DIAL
NUMBER (617) 210-

June 17, 1997

HAND DELIVERED

Office of the Clerk
United States Court of Appeals
for the First Circuit
U.S. Post Office & Courthouse
90 Devonshire Street
Boston, Massachusetts 02109-4590

Re: United States v. Alfred Trenkler
Appeal No. 97-1239

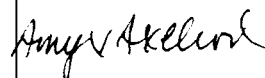
Dear Sir/Madam:

Enclosed for filing please find the following document:

Defendant-Appellant Alfred W. Trenkler's Assented to Motion to Extend The
Briefing Date

Thank you for your attention to this matter.

Very truly yours,



Amy J. Axelrod

AJA:dsg

Enclosure

cc: Kevin McGrath, Assistant
United States Attorney
Paul V. Kelly, Esquire
Frank A. Libby, Esquire
Morris M. Goldings, Esquire
Terry P. Segal, Esquire

NO. 97-1239

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

UNITED STATES OF AMERICA
Appellee,

v.

ALFRED W. TRENKLER
Defendant-Appellant

DEFENDANT-APPELLANT ALFRED W. TRENKLER'S
ASSENTED TO MOTION TO EXTEND THE BRIEFING DATE

The Defendant-Appellant Alfred W. Trenkler respectfully moves this Court for a thirty day extension of time within which to file his Brief, from July 10, 1997 to August 8, 1997. As reasons therefor, the Defendant-Appellant states:

- 1) He is currently serving a life sentence after having been convicted by a Jury on November 29, 1993 for conspiracy under 18 U.S.C. §371, receipt of explosive materials under 18 U.S.C. §844(d), and attempted malicious destruction of property by means of explosive under 18 U.S.C. §844(i);
- 2) This appeal is from the denial by the trial court (Zobel, J) of two separate and distinct post-trial motions. The first, Defendant's Motion for a New Trial Or, In The Alternative, For An Evidentiary Hearing, related to a possible undisclosed agreement between the Government and a key Government witness who, in the Government's words, provided "substantial assistance" to the Government in obtaining the conviction of the Defendant-Appellant. The witness was then released, shortly after the Defendant-Appellant's trial, approximately three and a half years into an eight-

year prison term. The second motion on appeal, Defendant's Motion for Judicial Inquiry into Possible Juror Misconduct and For a New Trial, related to possible juror misconduct during the Defendant-Appellant's trial by an alternate juror who may have failed to disclose that she knew the Defendant-Appellant.

- 3) The Defendant-Appellant received the briefing notice on June 9, 1997, one month before the brief is currently scheduled to be filed with the Court;
- 4) Due to the press of business, the Defendant-Appellant's counsel requires additional time to communicate with the Defendant-Appellant and to prepare appropriately the Brief that involves two separate and distinct post-trial motions; and
- 5) Assistant United States Attorney Kevin McGrath has assented to this motion.

WHEREFORE, the Defendant-Appellant, for good cause shown, respectfully requests that this Court enlarge the time for filing his brief for thirty days from July 10, 1997 to August 8, 1997.

RESPECTFULLY SUBMITTED,

DEFENDANT-APPELLANT
ALFRED W. TRENKLER

By his Attorneys,

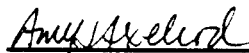


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DATED: June 17, 1997

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document(s) was served upon the attorney of record for each other party by first class mail and fax on June 12, 1997.



#11458