

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JUL 15 10 53 AM '99

U.S. DISTRICT COURT
DISTRICT OF MASS.

ALFRED TRENKLER,

Petitioner,

v

UNITED STATES OF AMERICA

Respondent.

Case No: 99-CV-10074 -RWZ

Hon> R. Zobel, District Judge

DOCKETED

MOTION FOR LEAVE TO FILE TRAVERSE, INSTANTUR

COMES NOW, Alfred Trenkler, Petitioner pro se, who respectfully asks this Court to allow him to file his TRAVERSE to the Government's Response instantur for the following reasons:

(1) Petitioner has been assisted throughout these proceedings by the law firm of Michael B. Cohen, 2725 North Thatcher, Suite 409, River Grove, Illinois, 60171, for the researching and document preparation of this TRAVERSE;

(2) that difficulties in the staff at Mr. Cohen's office made it impossible to submit this TRAVERSE to the Court as planned in mid June;

(3) that the TRAVERSE was only printed on July 12, 1999 and sent immediately to this Court and all required parties:

(4) that the delay was not the fault of Petitioner and should not be held against him;

THEREFORE, Petitioner prays that this Court will allow him to file the TRAVERSE

instantur.

DOCKETED

Michael B. Cohen

Michael B. Cohen,

*Treating this as a motion for extension of time, it is allowed
Ryan W. Zobel, J.
8/31/99*



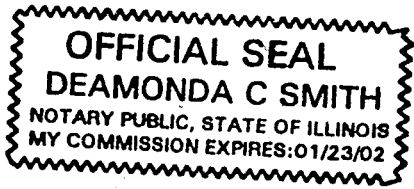
I affirm under the pains of perjury that the foregoing is true and correct to the best of my knowledge.

Michael P. Cohen

SUBSCRIBED AND SWORN BEFORE ME THIS 12TH DAY OF JULY 1999 AT RIVER GROVE, ILLINOIS.

Deamonda C Smith

NOTARY PUBLIC



I _____ hereby certify
that I mailed a copy of this order to
Attorney's _____
on 9/1/99.

[Signature]
Deputy Clerk

**TO: UNITED STATES ATTORNEY
Mr. Kevin McGrath
U.S. Courthouse
Suite 9200
1 Courthouse Way
Boston, MA 02210**

FILED
IN CLERK'S OFFICE

JUL 15 10 53 AM '99

U.S. DISTRICT COURT
DISTRICT OF MASS.

CERTIFICATE OF SERVICE

I do hereby certify that I have caused a copy of the foregoing motion(s) to be served upon the above named counsel, by mailing them a copy, with proper first class postage prepaid, to the above listed address, by placing a copy of same in the U.S. Post Office at River Grove, Illinois on or before 4:30 p.m. on this 3RD day of June 1999

Michael B Cohen

Michael B. Cohen, Esq.