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| Adams County Combined Courts DA FIL  Adams County Justice Center CA  1100 Judicial Center Drive Brighton CO 80601  **Plaintiff: People of the State of Colorado vs.**  **Defendant: Leopoldo Gutierrez**  Stephen L. Alonzi, Reg. 12709 Mike K. Pellow, Reg.17945 Shana R. Beggan, Reg. 32205 Alonzi Pellow Beggan, LLC 455 Sherman Street, Suite #400  Denver, CO 80203  Phone Number: 303.825.9600/303-831-7609  Fax Number: 303.845.5770  [steve@apblaw.net](mailto:steve@apblaw.net) [mike@apblaw.net](mailto:mike@apblaw.net) [shana@apblaw.net](mailto:shana@apblaw.net) | TE FILED: June 9, 2017 12:29 PM  ING ID: 5BFBC7ED54789 SE NUMBER: 2016CR3983   COURT USE ONLY  |
| Case Number: 16CR3983 Division : G |
| **Unopposed Motion to Continue Jury Trial Scheduled for June 21, 2017** | |

The Defendant, Leopoldo Gutierrez, by and through his legal counsel, hereby requests without objection from the People a continuance of the jury trial presently scheduled for June 21, 2017. This motion is made on the following grounds:

1. Undersigned counsel, Mike Pellow, has represented Defendant throughout the course of this case, including all court appearances. Counsel is scheduled to begin a jury trial on charges of sexual assault and kidnapping in Denver County on June 13, 2017 in Case Number 15CR6087 – People v. Kennedy.
2. Counsel initially believed that he would complete that trial before June 21, 2017 and would be able to try this case on the scheduled date. However, counsel has been advised that the court in the Kennedy case will be handling its own docket during the course of the trial, and thus counsel will still be in trial on June 21, 2017.
3. Counsel has discussed the situation with the assigned deputy district attorney, Ashley Shelton, who has complied with her VRA requirements and has informed counsel that she does not object to the continuance.
4. This is the first trial setting of the case. Counsel has been diligent in moving the case along, requesting only one continuance early on to obtain discovery.
5. Defendant has been advised of his speedy trial rights and wishes to waive speedy trial, so that the continuance may be granted.

Dated: June 9, 2017

Respectfully submitted, Alonzi Pellow Beggan, LLC

I certify that on the 9th day of JUNE 2017, I served via ICCES copy of the foregoing Entry of Appearance to**:**

17th Judicial District Attorney’s Office 1000 Judicial Center Drive, Suite 100

Brighton CO 80601

By: s/ Mike Pellow