UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

UNITED STATES OF AMERICA)	
)	No. 3:17-cr-00082-002
v.)	Hon. Thomas A. Varlan, Chief USDJ
)	
HEATHER ANN TUCCI-JARRAF)	

SECOND MOTION OF THE DEFENDANT HEATHER ANN TUCCI-JARRAF FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE POST-VERDICT MOTIONS

The Defendant **HEATHER ANN TUCCI-JARRAF** respectfully moves this Honorable Court for an additional extension of time under FRCrimP 45(b)(1)(A) within which to file a motion for a new trial under FRCrimP 33, and a motion for a judgment of acquittal under FRCrimP 29.

IN SUPPORT of this motion, undersigned counsel for the moving Defendant states that due to an administrative error for which undersigned counsel is responsible, a delay in the Court's processing of this Defendant's application for a voucher for the trial transcript occurred. Counsel is advised that 30 days or more will be needed for the preparation of the transcript, after which additional time will be needed for review of the transcript, and for the preparation of the FRCrimP 33 and 29 motions for which the transcript is needed.

FRCrimP 45(b)(1)(A) authorizes the extension of time sought for good cause on a party's motion made before the previously extended time expires. The Court previously extended the time for filing a motion or motions under FRCrimP 33 and 29 to March 30, 2018. The moving Defendant suggests that the Court set a new deadline for this purpose during the second half of May 2018.

Respectfully submitted,

s/ Francis L. Lloyd, Jr.

LAW OFFICE OF FRANCIS L. LLOYD, JR. 9111 Cross Park Drive, Suite D-200 Knoxville, TN 37923

tel: (865) 470-4077 fax: (865) 978-6504

E-Mail: FLLloydJr@gmail.com Counsel for the Defendant Heather Ann Tucci-Jarraf

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all the parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Francis L. Lloyd, Jr.