**IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA**

**CRIMINAL**

**COMMONWEALTH OF PENNSYLVANIA :**

**:**

**v. : CP-38-CR-2157-2019**

**:**

**LUIS SOUCLAT-NIEVES :**

**MOTION FOR TIME EXTENSION**

TO THE HONORABLE JUDGES OF SAID COURT:

AND NOW comes, the Defendant Luis Souclat-Nieves, by and through his counsel, Shannon S. Pascal, Assistant Public Defender and respectfully presents the following:

1. At action number CP-38-CR-2157-2019 Defendant is charged with one (1) count of Theft By Unlawful Taking—Moveable Property.
2. On December 19, 2019, Defendant waived his preliminary hearing.
3. On January 8, 2020, Defendant waived his formal arraigned scheduled for January 22, 2020.
4. On February 18, 2020, Counsel was appointed to represent Defendant in this matter.
5. On February 18, 2020, Counsel for Defendant requested Discovery.
6. As of the filing of this motion, Counsel for Defendant has not received discovery from the District Attorney.
7. The thirty (30) day deadline to file pretrial motions expires on February 21, 2020.
8. Defendant is scheduled for Call of the List on March 3, 2020, and Defendant is to appear for Trial on March 16, 2020.
9. Defense Counsel respectfully requests a time extension to file pretrial motions and that the Commonwealth be ordered to provide Defense Counsel with discovery.

WHEREFORE, Defendant respectfully requests This Honorable Court to grant an appropriate Order for a Time Extension in which to file any meritorious Omnibus Pre-Trial Motions.

Respectfully submitted,

Shannon S. Pascal

Assistant Public Defender

Attorney ID # 324318

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**O R D E R**

AND NOW, to wit, this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2020, upon consideration of the Motion of Defendant, it is hereby Ordered, Defendant shall be granted an extension. Defendant shall have until \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ to file an Omnibus Pre-Trial Motion. Defendant is to appear for the Call of the List Scheduled on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Defendant is to appear for Trial on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. The Commonwealth shall provide Defense Counsel with a copy of discovery in this matter on or before , 2020.

BY THE COURT:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, P.J.

Cc: District Attorney

Court Administration

Public Defender’s Office

Defendant

**IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA**

**CRIMINAL**

**COMMONWEALTH OF PENNSYLVANIA :**

**:**

**v. : CP-38-CR-412-2017**

**:**

**LUIS SOUCLAT-NIEVES :**

# CERTIFICATE OF SERVICE

I, Shannon S. Pascal, Assistant Public Defender, certifies a true copy of this motion was sent to the following people in the following manner:

Office of the District Attorney Inter Office Mail

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Shannon S. Pascal

Attorney No. 324318