

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 2:15-CR-00212
	)	
ABIGALE LEE MILLER,	)	
	)	
Defendant.	)	

**SECOND MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS**

AND NOW, comes Defendant, Abigale Lee Miller (“Ms. Miller”), by and through counsel, and files this Second Motion for Extension of Time to File Pretrial Motions, stating as follows:

1. On October 13, 2015, the Government filed an Indictment against Ms. Miller charging her with two (2) counts of bankruptcy fraud, five (5) counts of concealment of bankruptcy assets, and 13 counts of making false bankruptcy declarations. *See* Indictment and Indictment Memo., ECF Nos. 1-2.

2. Ms. Miller’s arraignment occurred on November 2, 2015. *See* Arraignment, ECF Nos. 10-12.

3. During the arraignment hearing, the Court granted Ms. Miller’s Motion for Extension of Time to File Pretrial Motions, and the deadline for filing pretrial motions is currently December 17, 2015.

4. On December 3, 2015, undersigned counsel met with Assistant United States Attorney Gregory C. Melucci, FBI Special Agent Sean Langford, IRS Special Agent John Klee, and Postal Inspector David Gealey.

5. At said meeting, Special Agent Langford provided two (2) discs containing discovery material pursuant to Federal Rule of Criminal Procedure 16.

6. Undersigned counsel is in the process of reviewing the discovery material provided on the discs by Special Agent Langford.

7. Additional Rule 16 discovery material which has not been provided to undersigned counsel exists at the FBI's Pittsburgh Office, and the parties have agreed that undersigned counsel will inspect and review the material at the FBI's office.

8. Additional time is needed for undersigned counsel to fully review the discovery material provided and to inspect and review the material located at the FBI's Pittsburgh Office in order to perform a complete investigation of the facts and law before making informed decisions concerning the filing of pretrial motions.

9. Pursuant to Local Rule of Criminal Procedure 12, Ms. Miller respectfully requests that the Court extend the deadline for the filing of pretrial motions by 45 days.

10. If this Motion is granted, the deadline for the filing of pretrial motions will be Monday, February 1, 2016.

11. If this Motion is granted, the extension of the deadline for the filing of pretrial motions by 45 days shall be excludable time as set forth under 18 U.S.C. § 3161(h).

12. Assistant U.S. Attorney Melucci has no objection to this Motion.

WHEREFORE, Defendant, Abigale Lee Miller, respectfully requests that this Honorable Court grant her Second Motion for Extension of Time to File Pretrial Motions and enter the proposed Order attached hereto.

Date: December 10, 2015

Respectfully submitted,

CLARK HILL, PLC

By: /s/ Robert J. Ridge  
Robert J. Ridge, Esquire  
PA I.D. No.: 58651  
E-mail: [rridge@clarkhill.com](mailto:rridge@clarkhill.com)

Brandon J. Verdream, Esquire  
PA I.D. No.: 204162  
E-mail: [bverdream@clarkhill.com](mailto:bverdream@clarkhill.com)

Firm I.D. No.: 282  
One Oxford Centre  
301 Grant Street, 14<sup>th</sup> Floor  
Pittsburgh, PA 15219  
Telephone: (412) 394-7711  
Fax: (412) 394-2555

*Attorneys for Defendant, Abigale Lee Miller*

Deadline.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Second Motion for Extension of Time to File Pretrial Motions and proposed Order** have been served on all counsel of record this 10<sup>th</sup> day of December, 2015, by this Court's CM/ECF e-filing notification system.

/s/ Robert J. Ridge

Robert J. Ridge, Esquire

Brandon J. Verdream, Esquire

Deadline.com