

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. **Year**-cr-**No.**

v.

Defendant,

Defendant.

**MOTION TO SCHEDULE CASE FOR COMBINED PLEA COLLOQUY AND
SENTENCING HEARING AND FOR PREPARATION AND DISCLOSURE OF A
PRE-PLEA PRESENTENCE REPORT**

Defendant **Defendant**, through attorney **Defense Attorney**, asks the court to schedule a date for a combined guilty plea colloquy and sentencing hearing. Under Federal Rules of Criminal Procedure 32.1(e)(1), the defendant also consents to the preparation and pre-plea disclosure of the presentence investigation report. In support of the motion, the defendant states that

1. The defendant has been charged with **Charged Offense[s]**.
2. **Plea/No Plea -Select from Drop-Down Menu**
3. The defendant asks the court to schedule a combined plea colloquy and sentencing hearing no earlier than 120 days from the date the court grants this motion.
4. The defendant asks the court to direct the United States Probation Office to prepare a presentence report under Fed. R. Crim. P. 32(d) and Crim. L.R. 32 (E.D. Wis.). The defendant has discussed with counsel the fact that

under Fed. R. Crim. P. 32(e)(1), the probation office may not submit the presentence report to the court or anyone else until after the defendant has pled guilty, unless the defendant has consented to early disclosure in writing. The defendant consents and asks the court to allow the probation office to disclose the report to the court and the parties before the combined plea/sentencing hearing.

4. Assistant United States Attorney **AUSA** does not object to this motion.

5. The defendant agrees that the court may make a finding that the ends of justice served by the delay in setting the combined hearing outweigh the best interests of the public and the defendant in a speedy trial under 18 U.S.C. §§3161(h)(7)(A), (h)(7)(B)(i) and (h)(7)(B)(iv), and that the court may exclude the time between the filing of this motion and the date of the combined hearing from the Speedy Trial calculation.

Dated in Milwaukee, Wisconsin, **Click and Select Date.**

By: _____

Counsel for the Defendant
