

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CR. No.: 2:11CR-209-WKW
)	
ROBERT JERRELL BONNER)	

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW the Defendant, **Robert Jerrell Bonner**, by and through undersigned counsel, Kacey L. Keeton, and pursuant to 18 U.S.C. §§ 4241(c) and 4247(d) moves to continue the Competency Hearing set for July 24, 2012, to on or after August 1, 2012. In support of this motion, Mr. Bonner would show the following:

1. The Government, through Assistant United States Attorney Brent Woodall, does not oppose this Motion.
2. On March 27, 2012, this Court ordered that Mr. Bonner be transferred to the Bureau of Prisons for a forensic evaluation. (DOC# 34). The Court’s Order provided that the Bureau of Prisons was to complete this evaluation “within 60 days from the date of the defendant's arrival at the institution.” (DOC# 33).
3. The Report from the Bureau of Prisons was not issued until June 29, 2012.
4. A Competency Hearing is set before this Court for July 24, 2012.
5. Dr. Catherine Boyer, who performed evaluations on Mr. Bonner at the request of Undersigned Counsel, is unavailable on July 24, 2012, as she is out of town. Dr. Boyer is needed to testify at the Competency Hearing on behalf of Mr. Bonner.

6. Additionally, undersigned is assigned counsel in the matter of *Robin Myers v. State of Alabama*. The United States Supreme Court recently denied Mr. Myers' Petition for Certiorari, and undersigned counsel has had a set appointment to meet with Mr. Myers at Holman Correctional Facility on July 24, 2012, to discuss the next steps in his litigation. Appointments at Holman are limited and require advanced scheduling.

7. Counsel requests that the Competency Hearing in this matter be rescheduled on or after August 1, 2012, so that Dr. Boyer and undersigned counsel are both available.

8. It is reasonable and in the interest of justice to continue the pending Competency Hearing.

9. Mr. Bonner is currently detained at the Montgomery City Jail, and does not oppose the continuance. Further, a continuance will not affect the trial date set in this matter.

WHEREFORE, for the reasons stated above, Mr. Bonner requests that this Court continue his Competency Hearing to a later date, to be set no earlier than August 1, 2012.

Dated this 20th day of July, 2012.

Respectfully submitted,

/s/ Kacey L. Keeton

KACEY L. KEETON

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