

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

United States of America,  
Plaintiff

v.

Thomas A. Shay,  
Alfred W. Trenkler,  
Defendants

Criminal No.: 92-10369-Z

**DEFENDANT ALFRED TRENKLER'S MOTION FOR ADDITIONAL  
TIME TO FILE PRE-TRIAL MOTIONS**

Now comes defendant and requests additional time to file pre-trial motions.

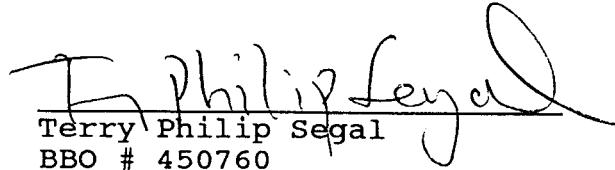
In support of this motion, defendant states:

1. The prosecution, pursuant to automatic discovery, has provided, in a timely fashion, substantial material which defendant has analyzed in a timely manner.

2. Presently, the government, pursuant to already filed motions and automatic discovery, is in the process of reproducing photographic displays shown to witnesses and transporting physical evidence for inspection by defendant, from the ATF lab in Rockville, Maryland, to Boston.

Wherefore, defendant respectfully requests an additional 30 days to file pre-trial motions, so that he will have sufficient time to analyze government evidence not yet made available to him, and then file possible additional motions.

Respectfully submitted,  
For the Defendant,  
ALFRED W. TRENKLER,  
By his attorneys,



Terry Philip Segal  
BBO # 450760  
Scott P. Lopez  
BBO # 549556  
**Segal & Feinberg**  
210 Commercial Street  
Boston, MA 02109  
(617) 720-4444

Dated: February 15, 1993

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above  
document was served upon the attorney of record for  
each other party by mail (by hand) on 2/15/93

