

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

vs.

THOMAS A. SHAY and
ALFRED W. TRENKLER

Criminal No.:
92-10369-Z

**DEFENDANT, ALFRED W. TRENKLER'S MOTION TO ESTABLISH
NEW TRIAL DATE AND CONDITIONS OF RELEASE**

Now comes Defendant, Alfred W. Trenkler, and moves this Honorable Court to establish a new trial date and conditions of release until said trial.

As ground for this motion Defendant states as follows:

1. Defendant's trial is presently scheduled for August 16, 1993.
2. On July 13, 1993, during the morning recess in the Thomas A. Shay trial, this Court indicated in a conference at side bar that the Court would not be in a position to reach defendant's trial on August 16th.
3. During said conference, Assistant United States Attorney Paul V. Kelly represented to the Court that at the conclusion of the Shay trial he would agree to defendant's release so long as appropriate bail conditions such as home confinement and electronic monitoring were established.

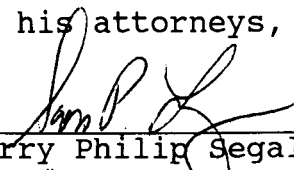
4. Mr. Kelly further represented that Terry Philip Segal had indicated that he would agree to waive defendant's speedy trial rights so long as defendant was released from custody.

5. Defendant will waive his speedy trial rights so long as he is released from custody. With respect to release conditions, defendant suggests that the conditions of home confinement at 7 Whitelawn Avenue in Milton, MA and electronic monitoring be imposed. Defendant further suggests that said electronic monitoring be fashioned to permit him to travel to counsel's office and to other significant locations escorted by counsel or counsel's employee. In this way defendant will be able to assist in the preparation for his trial.

6. Should defendant be released, defendant further requests this Court establish a new trial date in December since counsel is scheduled to go to trial in October in a murder trial entitled Commonwealth v. Haskard (see attached order) and in a tax fraud case in November entitled United States v. Olbres (see attached order).

WHEREFORE, defendant respectfully requests this Court establish appropriate release conditions, and a new trial date in December, 1993.

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

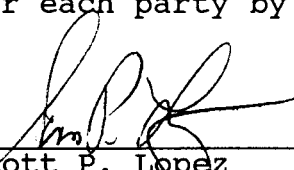


Terry Philip Segal
BBO # 450760
Scott P. Lopez
BBO # 549556
Segal & Feinberg
210 Commercial Street
Boston, MA 02109
(617) 720-4444

Dated: July 22, 1993

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by messenger on July 22, 1993.



Scott P. Lopez

COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT
40 THORNDIKE STREET
CAMBRIDGE, MA 02141

Robert A. Barton
Regional Administrative Justice - Criminal

July 1, 1993

ASSIGNMENT OF MURDER CASES

HONORABLE Patti Saris
COURT ROOM 10B
MIDDLESEX SUPERIOR COURT
E. CAMBRIDGE, MA. 02141

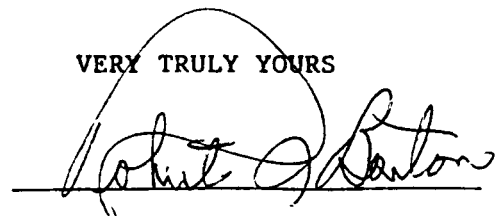
DEAR JUDGE Saris

YOU ARE HEREBY ASSIGNED THE MURDER CASE OF COMMONWEALTH VS Deborah & Thomas Haskard
WHICH IS SCHEDULED FOR Trial ON 10/4/93
IN YOUR SESSION.

COUNSEL FOR THE COMMONWEALTH Sheila Calkins, A.D.A

COUNSEL FOR THE DEFENDANT Deborah Haskard-Matthew H. Feinberg, Esq.
Thomas Haskard-Terry Philip Segal, Esq.

VERY TRULY YOURS



REGIONAL ADMINISTRATIVE JUDGE

CC: A.D.A Sheila Calkins

ATTORNEY Matthew H. Feinberg and Terry Philip Segal

APR 29 1 51 PM '93

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Criminal No. 93-27-01-02-M

Anthony G. Olbres
Shirley A. Olbres

O R D E R

Defendants Shirley and Anthony Olbres' Motions to Continue Trial Date are granted. The government's objection is noted, but the Court is not presently scheduled to draw juries or hold trials in early June under the current courtroom allocation plan, so a June 8 trial would be feasible only by special arrangement.

Given the delay occasioned by this continuance, albeit at defendants' request, no further continuance will likely be granted.

A final pretrial conference will be scheduled in September 1993.

Counsel to Defendants Shirley and Anthony Olbres shall file defendants' waiver of speedy trial rights not later than May 10, 1993. On the filing of such waiver the continuance shall be effective. The Court finds that the ends of justice served by granting a continuance outweigh the best interest of the public