

S.C. 20429

STATE OF CONNECTICUT

:

SUPREME COURT

VS.

:

BRUCE JOHN BEMER

:

July 2, 2020

MOTION FOR EXTENSION OF TIME

Pursuant to Practice Book § 66-1, the Defendant moves for a 30-day extension of time until Wednesday, August 5, 2020 in which to file his reply brief because of the ongoing COVID-19 crisis and the need to prepare a further review of the State's extensive brief.

i. Brief History

The Defendant was convicted of four counts of patronizing a trafficked person in violation of § 53a-83 and 1 count of trafficking in persons as an accessory in violation of §§ 53a-192a and 53a-8. He appealed to the Appellate Court and the case was transferred to this Court.

ii. Specific Facts

The Defendant's brief was filed on October 2, 2019. The State filed its brief on May 22, 2020. The Defendant's reply brief is due on July 6, 2020. Because of the COVID-19 crisis, the Defendant requires further time to review and respond to the extensive briefing by the State. The State has an extensive 17-page discussion of the evidence throughout the Statement of Facts and Issue I, all of which must be reviewed and responded to. In addition, the State makes numerous procedural arguments in Issue II all of which also must be researched and also responded to. The Defendant is well along in his preparations and

should be able to meet the August 5 deadline. The undersigned has been unable to reach Attorney Killen, the lawyer for the State, in order to determine whether the State consents.

iii. Legal Grounds

This Court may grant an extension for good cause. The existence of COVID-19 and the extensiveness of the briefing by the State constitutes due cause.

DEFENDANT, BRUCE J. BEMER

By: /s/ 027965
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CERTIFICATION

I certify in accordance with the provisions of § 62-7 and that (1) on July 2, 2020 a copy was delivered to counsel of record listed below; (2) the document has been redacted or does not contain any names or other personal identifying information or case law; and (3) that the document complies with all applicable rules of appellate procedure.

I certify in accordance with the provisions of § 66-1(b) that a copy of this motion has been delivered to my client who are parties to the appeal.

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