

STATE OF INDIANA)
)ss:
COUNTY OF CARROLL)

STATE OF INDIANA)
)
vs.)
)
RICHARD M. ALLEN)

IN THE CARROLL CIRCUIT COURT

CAUSE NO. 08C01-2210-MR-000001

**DEFENDANT’S MOTION TO CONTINUE BAIL HEARING
AND JURY TRIAL SETTING**

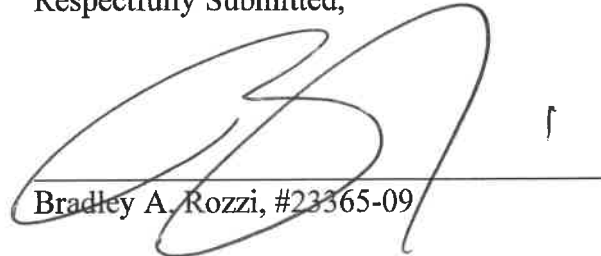
Comes now the Defendant, Richard M. Allen, by Counsel, Bradley A. Rozzi, and respectfully requests that this Court continue the bail hearing and jury trial currently scheduled in this matter. In support of said Motion, Defendant Allen states as follows:

1. On November 21, 2022, Defendant Allen filed his Petition to Let Bail. Said Petition is scheduled for hearing on February 17, 2023, at 10:00 a.m.;
2. The defense has yet to receive the entirety of discovery from the State and therefore, is not yet prepared to proceed with the bail hearing;
3. The defense anticipates receiving the remaining discovery by the end of this week;
4. Defense Counsel believes that the volume of discovery is such that there will not be adequate time to review the discovery in preparation for the bail hearing;
5. Defendant Allen respectfully requests that the bail hearing scheduled on February 17, 2023, be lifted and reset on a date and time convenient for the Court and the parties;
6. Defendant Allen also acknowledges that the jury trial is scheduled in this cause on March 20, 2023. The exchange and review of discovery, as referenced above, will necessitate that the jury trial be lifted and reset on a date and time convenient for all parties; and
7. Wherefore, Defendant Allen requests that both the bail hearing and jury trial dates be lifted and reset on dates and times convenient for the Court and the parties.

HILLIS, HILLIS,
ROZZI & DEAN, LLC
ATTORNEYS AT LAW
200 FOURTH ST.
LOGANSPORT, IN 46947
(574) 722-4580
FAX (574) 722-2659

JOHN R. HILLIS
I.D. #7533-09
BRADLEY A. ROZZI
I.D. #23365-09
BRADEN J. DEAN
I.D. #31941-34

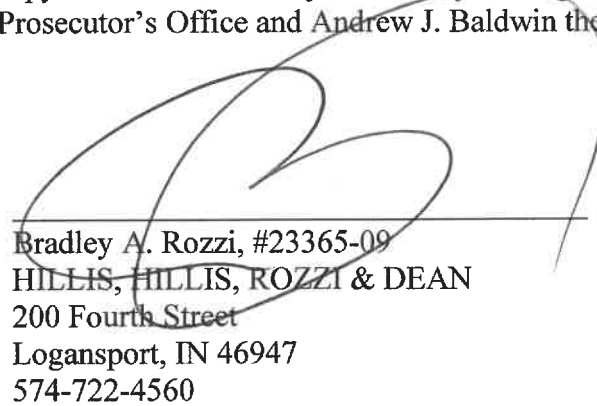
Respectfully Submitted,



Bradley A. Rozzi, #23365-09

CERTIFICATE OF SERVICE

I certify that I have served a copy of this document by the County e-filing system upon the Carroll County Prosecutor's Office and Andrew J. Baldwin the 7th day of February, 2023.



Bradley A. Rozzi, #23365-09
HILLIS, HILLIS, ROZZI & DEAN
200 Fourth Street
Logansport, IN 46947
574-722-4560

**HILLIS, HILLIS,
ROZZI & DEAN, LLC**
ATTORNEYS AT LAW
200 FOURTH ST.
LOGANSPORT, IN 46947
(574) 722-4560
FAX (574) 722-2659

JOHN R. HILLIS
I.D. #7593-09
BRADLEY A. ROZZI
I.D. #23365-09
BRADEN J. DEAN
I.D. #31941-34