

1 **Joy Bertrand, Esq.**
2 PO Box 2734
3 Scottsdale, Arizona 85252-2734
4 Telephone: 602-374-5321
5 Fax: 480-361-4694
6 joyous@mailbag.com
7 www.joybertrandlaw.com
8 Arizona State Bar No. 024181

9 **ATTORNEY FOR: DEFENDANT**

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**

12 United States,
13 Plaintiff,

Case No. CR-18-422-SMB

14 v.

NOTICE OF JOINDER

15 Joye Vaught,
16 Defendant.

17 PLEASE TAKE NOTICE THAT the Defendant, Joye Vaught, through her
18 attorney, Joy Bertrand, hereby joins the Defendant Andrew Padilla’s Motion to
19 Continue. (ECF Doc. 628) In doing so, she adopts the facts and legal arguments
20 presented in this Motion.
21

22 Ms. Vaught’s Counsel is in the same situation as Mr. Padilla, having been
23 appointed under the Criminal Justice Act on or about May 3, 2019. Like Mr.
24 Padilla’s Counsel, Ms. Vaught also faces the daunting task of reviewing and
25 analyzing what is estimated to be more than ten million pages of documents.
26 Like Mr. Padilla’s Counsel, Undersigned Counsel also must familiarize herself
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1 with ancillary litigation in this District, the Central District of California, and
2 Ninth Circuit Court of Appeals. Even if Undersigned Counsel spent every
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4 working hour, forty hours per week, for the next 31 weeks, she would have to
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6 read 8,065 pages per hour. Even with the assistance of search tools and access to
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8 data stored on Relativity, that review is impossible in the short time set in the
9
10 current scheduling order.

11 Ms. Vaught hereby joins Mr. Padilla's Motion and asks this Court to vacate
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13 the current trial date and to set a scheduling conference to address the upcoming
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15 deadlines set forth in the Court's May 1, 2018 Order. (ECF Doc. 131)

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RESPECTFULLY SUBMITTED this Seventeenth day of June, 2019.

s/Joy Bertrand
Joy Bertrand
Attorney for Defendant

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CERTIFICATE OF SERVICE

On June 17, 2019, I, Joy Bertrand, attorney for the Defendant, filed the foregoing with the Arizona District Court’s electronic filing system. Based on my training and experience with electronic filing in the federal courts, it is my understanding that a copy of this pleading will be electronically served upon opposing counsel and co-defendants’ counsel, upon its submission to the Court.

Respectfully submitted this Seventeenth day of June, 2019.

s/Joy Bertrand
Joy Bertrand
Attorney for Defendant