

IN THE COURT OF COMMON PLEAS, MERCER COUNTY, OHIO
CRIMINAL DIVISION

STATE OF OHIO * CASE NO 23-CRM-148
v. *
ASHLEE R. HEINL-BOTKIN * MOTION TO CONTINUE TRIAL

The State of Ohio respectfully submits this Motion to Continue Trial. Currently, trial is scheduled to commence in this matter on October 1, 2024 at 8:30 AM. For the reasons set forth below, the State requests that the Trial be continued. **Defendant does not oppose this Motion.**

While preparing this matter for trial, the State obtained evidence of potential additional crimes, and the matter remains under investigation.

Additionally, on September 12, 2024, the State was contacted by Attorney Ashton Gaitanos, on behalf of Attorney Samuel Shamansky, who advised that he believed their law firm was not in possession of certain electronic discovery materials. The State reviewed its records and determined that electronic discovery was provided to then-local counsel for Defendant on October 23, 2023. Attorney Gaitanos advised, however, that electronic discovery was not provided by then-local counsel to current Defense Counsel. The State provided electronic discovery to current Defense Counsel on September 13, 2024. The materials are voluminous and will take time to review.

Accordingly, the State requests that the trial scheduled for October 1, 2024 be continued.

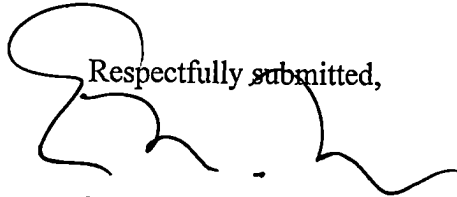
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SEP 13 2024

Richard J. Finner
MERCER COUNTY CLERK OF COURTS
CELINA, OHIO

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PROSECUTING ATTORNEY
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XC: COURT

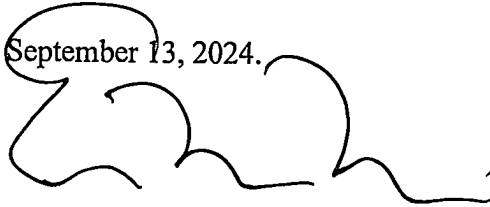
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent by electronic mail to Samuel H. Shamansky, Counsel for Defendant, on September 13, 2024.



Erin M. Minor, No. 0090274
Prosecuting Attorney

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