

# **Exhibit 13**

IN THE CIRCUIT COURT OF JASPER COUNTY AT JOPLIN  
STATE OF MISSOURI

STATE OF MISSOURI,	)	Cause No. 16AO-CR00722-01
Plaintiff	)	
	)	Division No. I
v.	)	
	)	
DORIAN SAMUELS,	)	
Defendant	)	

MOTION FOR CONTINUANCE

COMES NOW Dorian Samuels, by and through his attorney, John Hatcher, and respectfully requests a continuance of his case--presently set for jury trial on January 10 and 11, 2017 (with a pretrial conference on January 09, 2017--for the following reasons:

1. Mr. Samuels is charged with having committed a class B felony offense;
2. Mr. Samuels is presently in the custody of the Jasper County Sheriff and has been unable to post bond since his arrest on May 30, 2016;
3. Discovery in this case is ongoing and additional investigation is required in order to adequately prepare Mr. Samuels' defense;
4. Specifically, the State filed its Answer to Mr. Samuels' supplemental request for discovery on December 20, 2016 (and was received by Mr. Samuels' attorney several days, thereafter), which discovery consists of electronic files--e.g. audio and visual recordings of client interviews, communications with emergency dispatch, and other photographic images--that require the making of special accommodations in order to be viewed by Mr. Samuels at the Jasper County jail;

5. Furthermore, the existence and unavailability of certain other items requested is yet to be confirmed or disclosed by the State, and further investigation(s) may ultimately become necessary;
6. Mr. Samuels' representation in this matter by Mr. Hatcher began on June 29, 2016; since that time, the number and effectiveness of attorney-client communications has been limited for multiple reasons that are outside of Mr. Samuels' control; and
7. Finally, Mr. Hatcher represents a client in a separate matter who has invoked their right to a speedy trial and has been granted a two-day jury trial beginning January 12, 2017; it is improbable that Mr. Hatcher will be able to adequately prepare for both trials simultaneously.

WHEREFORE, the defense prays that this Honorable Court strike the current trial setting and reset Mr. Samuels' case for a date and time that it deems appropriate.

Respectfully submitted,

/s/ John Hatcher

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**Certificate of Service**

I hereby certify that on this 6th day of January, 2017, an electronic copy of the foregoing was sent through the Missouri e-Filing system to counsel of record.

/s/ John Hatcher

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John Hatcher