

AFFIDAVIT OF ATTORNEY GEORGE J. LEONTIRE

I, George J. Leontire, Jr., do hereby depose and state that the following is true to the best of my knowledge, understanding, and belief:

1. Defendant's council has not had sufficient time to prepare this case for trial.
2. The Commonwealth has spared no expense and amount of manpower to investigate and prepare its case against the Defendant over a four (4) year period.
3. The Commonwealth filed a Certificate of Compliance on November 11, 2016 that its Discovery obligations were complete. After submitting substantial additional disclosures the Commonwealth again filed another Certificate of Compliance on December 7, 2016 that its Discovery obligations were complete.
4. At the December 7, 2016 status hearing, and on numerous occasions thereafter, the Commonwealth disclosed hundreds of pages of discovery and disks containing thousands of pieces of potential evidence and additional disclosures with respect to additional expert witnesses that it intends to call.
5. The Defendant has detailed the history of this case and the recent disclosures made by the Commonwealth in its memorandum of law in support of this motion for continuance of the trial date.
6. Each piece of data has to be examined, evaluated and, where necessary, follow-up investigation of such matters undertaken.
7. There are numerous outstanding motions before the Court outstanding. Depending on the outcome of the outstanding motions the Defendant will need time to

investigate the underlying issues.

8. The Defendant does not have unlimited resources to investigate witnesses and other matters and must rely on the timely production of information by the Commonwealth if he is to be afforded the Constitutional protections he is entitled to.
9. Counsel has a legal and professional obligation to investigate all of the witnesses in this matter and all of the evidence being disclosed.
10. There is simply no way for Defense Counsel to adequately prepare the Defendant's defense given the time constraints imposed by the Court.

SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY THIS 1st DAY
OF FEBRUARY 2017.


George J. Leontire