

STATE OF INDIANA)	IN THE MIAMI CIRCUIT COURT
) ss:	
COUNTY OF MIAMI)	2023 TERM
)	
STATE OF INDIANA)	CAUSE NO. 52C01-2008-F4-000254
)	
vs.)	
)	
KEGAN KLINE)	

**MOTION TO LIFT PRETRIAL CONFERENCE AND JURY TRIAL AND SCHEDULE
FOR A CHANGE OF PLEA HEARING**

COMES NOW, the Defendant, Kegan Kline, by counsel, Andrew A. Achey, and respectfully requests that the Court lift the Pretrial Conference scheduled on March 30, 2023, at 10:00 a.m., and the Jury Trial scheduled on May 10, 2023, at 8:00 a.m.; May 11, 2023, at 8:00 a.m.; May 12, 2023, at 8:00 a.m.; May 15, 2023, at 8:00 a.m.; May 16, 2023, at 8:00 a.m.; May 17, 2023, at 8:00 a.m.; May 18, 2023, at 8:00 a.m.; and May 19, 2023, at 8:00 a.m., and schedule this matter for a Change of Plea Hearing. In support of said Motion, Defendant states as follows:

1. This matter is currently set for a Pretrial Conference on March 30, 2023, at 10:00 a.m., and a Jury Trial on May 10, 2023, at 8:00 a.m.; May 11, 2023, at 8:00 a.m.; May 12, 2023, at 8:00 a.m.; May 15, 2023, at 8:00 a.m.; May 16, 2023, at 8:00 a.m.; May 17, 2023, at 8:00 a.m.; May 18, 2023, at 8:00 a.m.; and May 19, 2023, at 8:00 a.m.

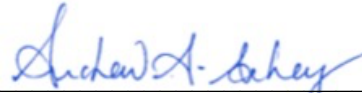
2. That the Parties have negotiated a proposed resolution in this Cause of Action;

3. That Prosecutor Courtney B. Alwine has been notified of this Motion to Continue and she has no objection to this Motion to Continue;

4. That this Motion to Lift the Pretrial Conference and Jury Trial and Schedule for a Change of Plea Hearing is not being made to unnecessarily delay the proceedings; and

5. That any delay resulting from this Motion to Lift the Pretrial Conference and Jury Trial and Schedule for a Change of Plea Hearing shall be attributable to the Defendant for purposes of Indiana Rule of Criminal Procedure 4.

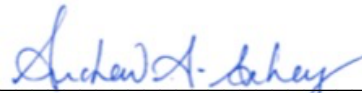
WHEREFORE, Counsel for the Defendant respectfully requests that this Court issue an Order lifting the Pretrial Conference scheduled on March 30, 2023, at 10:00 a.m., and the Jury Trial scheduled on May 10, 2023, at 8:00 a.m.; May 11, 2023, at 8:00 a.m.; May 12, 2023, at 8:00 a.m.; May 15, 2023, at 8:00 a.m.; May 16, 2023, at 8:00 a.m.; May 17, 2023, at 8:00 a.m.; May 18, 2023, at 8:00 a.m.; and May 19, 2023, at 8:00 a.m., and schedule this matter for Change of Plea and for all other just and proper relief in the premises.



Andrew A. Achey, #29604-09
The Law Office of Andrew Achey
206 Fourth Street
Logansport, Indiana 46947
Telephone: (574) 722-2221
andrew@andrewachey.law

CERTIFICATE OF SERVICE

I certify that I have served a copy of this Motion to Lift the Pretrial Conference and Jury Trial and Schedule for a Change of Plea Hearing upon the Miami County Prosecutor's Office this 20th day of March 2023 by the Court's Indiana Electronic Filing System pursuant to Indiana Rule of Civil Procedure 5.



Andrew A. Achey, #29604-09
The Law Office of Andrew Achey
206 Fourth Street
Logansport, Indiana 46947
Telephone: (574) 722-2221
andrew@andrewachey.law