

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES,
Appellee

**MOTION FOR LEAVE TO FILE
BRIEF EXCEEDING 50 PAGES**

v.

Docket No. ARMY 20210286

Private First Class (E-3)
LUIS A. MORALESSANCHEZ
United States Army,
Appellant

Tried at Fort Bliss, Texas, on 5 June, 3 August, 22 September 2020, 14, 25–26 January, 19 February, and 3–8, 10, 17 May 2021, before a general court-martial appointed by Commander, Fort Bliss, Colonel Michael S. Devine and Colonel Robert L. Shuck, military judges, presiding.

TO THE HONORABLE, THE JUDGES OF THE UNITED STATES ARMY
COURT OF CRIMINAL APPEALS

COME NOW the undersigned appellate defense counsel, pursuant to Rule 17.3(b) of this court's Rules of Appellate Procedure, and move for leave to file appellant's brief in excess of the page limitations set forth in the Rule.


Appellant respectfully submits that there is good cause to grant this motion. Appellant's case is lengthy and complex, involving a mixed plea with twenty-five specifications, to include two contested convictions for Article 118 offenses. The trial involved several motions, offenses related to events distinct in time and place, and significant expert testimony. Appellant was sentenced to confinement for a total term of forty years and ten months and a dishonorable discharge. The record of trial with exhibits and attachments is approximately 4,000 pages, which includes 1461 pages of trial transcript. Each of the three assignments of error involve a

separate area of law, and implicate material contained throughout most of the record. In order to fully address these issues, appellant requests this court grant appellant leave to file his brief in excess of the page limits.

WHEREFORE, appellate defense counsel respectfully request that this court grant the instant motion.

PANEL NO. 3



MOTION FOR LEAVE TO FILE
BRIEF EXCEEDING 50 PAGES

GRANTED: 

DENIED: _____

DATE: 28 FEB 23


FOR: WILLIAM E. CASSARA, Esq.
Civilian Appellate Defense Counsel



ANDREW R. BRITT
Captain, Judge Advocate
Appellate Defense Counsel
Defense Appellate Division

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was electronically submitted to the
Army Court and Government Appellate Division on 27 February 2023.



ANDREW R. BRITT
Captain, Judge Advocate
Appellate Defense Counsel
Defense Appellate Division