

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KIA FEYZJOU, ESQ. (SBN: 209816)
FEYZJOU LAW GROUP
4275 Main Street
Riverside, CA 92501
Tel: (951) 686-4818
Fax: (951) 686-4838

Attorney for Defendant,
KELLEY



IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO – CENTRAL COURTHOUSE

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

vs.

KELLEY

Defendant.

) CASE NO.:
)
) NOTICE OF MOTION TO DISMISS
) FOR DENIAL OF SPEEDY TRIAL
) [Penal Code §686(1)]; DECLARATION
) OF KELLEY
) DECLARATION OF KIA FEYZJOU
)
) Dept.:
) Date:
) Time:

TO THE DISTRICT ATTORNEY OF SAN BERNARDINO COUNTY
AND/OR HIS REPRESENTATIVE:

PLEASE TAKE NOTICE that on _____ at the hour of 8:30
a.m. or as soon thereafter as the matter may be heard in Department ____ of the above-
entitled court, the Defendant will move for an order dismissing the action.

The motion will be made on the ground that the prejudicial delay after the
initiation of formal charges against the defendant constituted a violation of the speedy trial
provisions of the Sixth and Fourteenth Amendments of the United States Constitution, and
Article I, §15 of the California Constitution.