

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
TWENTY SECOND JUDICIAL CIRCUIT
STATE OF MISSOURI**

STATE OF MISSOURI,)	
)	
Plaintiff,)	
)	Cause No. 1922-CR01583-01
vs.)	
)	Division: 23 & 1
TERRION LAMONT PHILLIPS,)	
)	
)	
Defendant.)	

STATE’S REQUEST FOR A CONTINUANCE

THE STATE OF MISSOURI, through Undersigned Counsel, requests a continuance of the current trial setting in this matter. In support thereof, the state declares as follows:

- 1) The original complaint in this case was filed on or about May 22, 2019.
- 2) On July 23, 2019, the state filed an indictment, wherein a grand jury found probable cause to believe that the defendant committed the following crimes on or about May 22, 2019: the class A felony of murder in the second degree, the class b felony of attempted robbery in the second degree, and two counts of the unclassified felony of armed criminal action.
- 3) On February 11, 2020, the defendant, through counsel, waived his prior assertion of a right to a speedy trial in writing. In addition, while it is true that the defendant reasserted his right to a speedy trial on December 23, 2020 and May 6, 2021, this is the first time a delay has been attributable to the state and the state’s reasons for requesting this continuance, as set forth in paragraph 6, constitute good cause as opposed to neglect of duty.
- 4) Since approximately March of 2020, this Court has either: a) not been conducting jury trials due to the worldwide COVID pandemic and restrictions placed on its ability to conduct jury trials by the Supreme Court of Missouri out of concern for public safety stemming from the worldwide COVID pandemic; or b) conducting a limited number of jury trials due to the worldwide COVID pandemic

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- 5) This is the first continuance request the state has made in this case.
- 6) Undersigned counsel is requesting this continuance because all previous assistant circuit attorneys assigned to this case have the left the office and Undersigned counsel is a new assistant circuit attorney who began employment with the st. louis circuit attorney's office on June 3, 2021 and who entered his appearance on June 17, 2020.
- 7) The defendant's ability to defend against the allegations in this case will not be prejudiced.

WHEREFORE, for good cause shown, the state requests this Court to remove this case from its trial docket of July 19, 2021 (and/or to provide such other relief as this Court deems just and proper).

NOTICE

Undersigned counsel gives notice that at 9:00 a.m. on June 29, 2021, or as soon thereafter as practical, undersigned counsel will appear in division 1 of the circuit court of the city of st. louis and call this motion up for hearing and ruling thereon.

Respectfully submitted this __24th__ day
of June, 2021, by:

/s/Srikant Chigurupati
Srikant Chigurupati
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Certificate of Service

A copy of the foregoing was hereby sent via the Missouri e-filing system this 24th day of June 2021 to Joshua Lohn.

Srikant Chigurupati