UNITED STATES OF AMERICA	)	
	)	
v.	)	**Government Request**
	)	**for Leave until 20 May 2013**
Manning, Bradley E.	)	**to Submit its Plan for**
PFC, U.S. Army,	)	**Expeditious Transcription of**
HHC, U.S. Army Garrison,	)	**Closed Sessions**
Joint Base Myer-Henderson Hall	)	
Fort Myer, Virginia 22211	)	**1 May 2013**

According to the Court's Scheduling Order of 15 April 2013, the United States must submit its plan to ensure expeditious transcription of closed sessions by 6 May 2013. *See* Appellate Exhibit (AE) 519. This plan is necessary to facilitate the curative courtroom closure measure of reviewing and making public those portions of closed session transcripts that are unclassified. *See* AE 511. The United States respectfully requests leave of the Court until 20 May 2013 to submit this plan.

The United States Army Military District of Washington (MDW) allocated one permanent and two temporary civilian court reporters to this court-martial. These individuals are currently being fully utilized by this court-martial. At this time, the Department of the Army does not have additional court reporters to dedicate to this court-martial. MDW has authorized funding for contractors to provide the required additional court reporter assistance. It is now in the process of approving a submitted proposal in order to secure this personnel. The United States anticipates this action will be complete for planning purposes in time to meet the requested 20 May 2013 suspense.

This request will not necessitate a delay in the proceedings because the continued effort to construct and resource this plan can occur concurrently with the scheduled pretrial motions process. There will be no prejudice to the defense.

ASHDEN FEIN
MAJ, JA
Trial Counsel

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel, via electronic mail on 1 May 2013.

ASHDEN FEIN
MAJ, JA
Trial Counsel