

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:08-cr-00297-FJG-5
)	
CYNTHIA D. JORDAN,)	
)	
Defendant.)	

**DEFENDANT CYNTHIA D. JORDAN'S MOTION FOR EXTENSION OF TIME TO
FILE PRE-TRIAL SUBSTANTIVE MOTIONS WITH SUGGESTIONS IN SUPPORT**

Cynthia D. Jordan, by and through her undersigned counsel, Charles C. Eblen, respectfully requests this Court for an Order extending the time in which she is to file pre-trial substantive motions in this case from May 8 to June 1, 2009.

1. On October 29, 2008, the Grand Jury returned a thirty-four count Indictment against 17 defendants. Defendant Jordan was charged in several counts with various crimes. The Indictment itself is 64 pages in length.

2. In recent months, the government has produced over sixty thousand documents in discovery.

3. This Court has previously granted requests to declare this case extended and complex pursuant to 18 U.S.C. § 3006A(d)(3). Such requests were based, in large part, on the recognition that with the number of defendants and volume of discovery, this case will involve significantly more attorney time than the average federal criminal case.

4. Defendant Jordan's counsel has already spent a large amount of time reviewing discovery materials, investigating these matters, and researching/analyzing the various charges and defenses.

5. Despite counsel's best efforts to comply with the Court's pre-trial motions deadline, additional time is needed for discovery review and to complete evaluation of the limited number of pre-trial motions that may be filed on Defendant Jordan's behalf. Counsel also needs additional time to discuss these matters with Defendant Jordan.

6. More specifically, undersigned counsel has had and will have weekly out-of-state travel obligations in other civil cases that will make accomplishing the above tasks extraordinarily difficult.

7. This Court's Trial Order states that all pre-trial motions shall be filed on or before May 8, 2009 and the parties shall have 12 days to respond to said motions. The trial is set for August 24, 2009.

8. An extension to file substantive pre-trial motions to **June 1, 2009** will give Defendant Jordan's counsel adequate time to complete his research and consult with his client regarding issue related to the filing of said motion(s).

9. Undersigned counsel contacted AUSA Linda Marshall before the filing of this Motion and she acknowledged by email that she will not oppose this request.

WHEREFORE, Defendant Jordan respectfully requests this Court for an Order extending the time to file substantive pre-trial motions to June 1, 2009 or for whatever other relief this Court deems just and proper.

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Charles C. Eblen

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ATTORNEY FOR DEFENDANT

CYNTHIA D. JORDAN

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May, 2009, I electronically filed the above and foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice to opposing counsel and counsel of record.

/s/ Charles Eblen

ATTORNEY FOR DEFENDANT

CYNTHIA D. JORDAN