

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 08-000297-10-W-FJG
v.)	
)	
CHERYL ANN ROMERO, et al.,)	
)	
Defendants.)	

**DEFENDANT CHERYL ANN ROMERO’S MOTION FOR EXTENSION OF TIME TO
FILE PRETRIAL MOTIONS WITH SUGGESTIONS IN SUPPORT**

NOW COMES Defendant Cheryl Ann Romero, by and through her counsel of record, James D. Henderson and Gary W. Hart, and moves this Court for an Order granting her an extension of time to file her pretrial motions from May 8, 2009, to May 22, 2009. This motion is based on the following:

1. Defendant Romero is charged in a mortgage fraud prosecution relating to the purchase of two residences in the Western District of Missouri and trial is presently scheduled for August 4, 2009. The Indictment named 17 defendants.
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 Romero'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 pretrial motions deadline of May 8, 2009, additional time is needed for discovery review and to complete evaluation of the limited number of pretrial motions that may be filed on Defendant Romero's behalf. Counsel also needs additional time to discuss these matters with Defendant Romero.

6. On May 8, 2009, undersigned counsel spoke with Assistant United States Attorney Linda Marshall, the Government prosecutor in this matter, who advised that she does not object to this motion for an extension of time to file pretrial motions from May 8, 2009, to May 22, 2009.

WHEREFORE, Defendant Romero respectfully requests this Court for an Order extending the time to file pretrial motions from May 8, 2009, to May 22, 2009, and for such other and further orders as this Court deems just and proper.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT
CHERYL ANN ROMERO

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served this 8th day of May 2009, by filing on the Electronic Filing system, which will provide notice to all counsel of record.

/s/ James D. Henderson by Gary W. Hart
Attorney for Cheryl Ann Romero