

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 08-00297-01-CR-W-FJG
)	
ANGELA R. CLARK)	
)	
Defendant.)	

**DEFENDANT ANGELA CLARK'S SECOND MOTION FOR EXTENSION
OF TIME TO FILE PRE-TRIAL SUBSTANTIVE MOTIONS
WITH SUGGESTION IN SUPPORT**

COMES NOW, Angela Clark, by and through her undersigned counsel, Patrick A. McInerney, and 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 18, 2009 to **May 22, 2009**.

1. On October 29, 2008, the Grand Jury returned a thirty-four count Indictment against 17 defendants. Defendant Clark was charged in 28 counts with various crimes from conspiring to commit mortgage fraud, in violation of 18 U.S.C. § 371, to interstate transportation of money obtained by fraud, in violation of 18 U.S.C. §§ 2314 and 2, wire fraud in violation of 18 U.S.C. §§ 1343 and 2, and monetary transactions involving the proceeds of a criminal offense, in violation of 18 U.S.C §§ 1957 and 2. 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 Defendant Clark's request to declare this case extended and complex pursuant to 18 U.S.C. § 3006A(d)(3). That request was 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 Clark'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 Clark's behalf. Counsel also needs additional time to discuss these matters with Defendant Clark.

6. This Court previously granted a request by Defendant Clark to extend the date to file pre-trial motions from May 8 to May. 18.

7. Several other defendants filed motions and have been granted extensions beyond the May 18 deadline set for Defendant Clark. *See* Docket Nos. 154,156,162,163,165,166.

8. The trial is set for August 24, 2009.

9. An extension to file substantive pre-trial motions to **May 22, 2009** will give Defendant Clark's counsel adequate time to complete his research and consult with his client regarding issue related to the filing of said motion(s).

10. Undersigned counsel communicated with AUSA Linda Marshall who indicated via email dated May 11, 2009 that there would be no objection to the requested extension.

WHEREFORE, Defendant Clark respectfully requests this Court for an Order extending the time to file substantive pre-trial motions to **May 22, 2009** or for whatever other relief this Court deems just and proper.

Respectfully submitted,

/s/ Patrick A. McInerney

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically with the Court, with notice of case activity to be generated and sent electronically by the Clerk of the Court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 15th day of May, 2009, upon all counsel of record.

/s/ Patrick A. McInerney

Attorney