

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

UNITED STATES OF AMERICA,)	
PLAINTIFF,)	
)	Criminal Action No. 12-06001-01-CR-SJ-GAF
vs.)	
)	
DEBORAH J. FLORES,)	
DEFENDANT.)	

**MOTION FOR SECOND EXTENSION OF TIME TO FILE
OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT**

COMES NOW the Defendant, Deborah J. Flores, by and through her attorney, Lisa G. Nouri, and respectfully moves the Court for an extension of time to file objections to the Presentence Investigation Report until April 8, 2013. As grounds therefore, the Defendant states:

1. Any objections are currently due on March 4, 2013.
2. Defendant is currently on pretrial release and resides in St. Joseph, Missouri.

Defendant typically communicates with counsel by telephone or email as it is cost prohibitive to meet in person. Defendant has recently had carpal tunnel surgery to go with her myriad of other ongoing health problems. Due to counsel's workload, Defendant and counsel have been unable to have a substantive discussion concerning any potential objections.

3. Objections to the presentence report may be filed as well as a supplement to the medical history. Counsel is seeking an additional 35 days to respond to the draft presentence report so as to obtain the most accurate information from the client and others. AUSA Jess Michaelson has no objection to this request for a 35 day extension of time.

4. On behalf of Defendant , counsel asks for an extension until April 8, 2013 to prepare any objections.

WHEREFORE, Defendant through counsel, moves the Court to extend the time for filing any objections to the Presentence Investigation Report until April 8, 2013.

Respectfully submitted,

/s/Lisa G. Nouri

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above foregoing document was electronically filed this 3rd day of March, 2013.

/s/Lisa G. Nouri

Attorney for Defendant