

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 12-06001-01/19-CR-SJ-GAF
)	
SHERRI GUTIERREZ,)	
)	
Defendant.)	

**DEFENDANT GUTIERREZ’S MOTION FOR AN EXTENSION OF TIME TO FILE
OBJECTIONS TO THE PRELIMINARY PRESENTENCE INVESTIGATION REPORT**

Defendant Sherri Gutierrez, by and through her appointed counsel, Nickalaus Seacord, respectfully moves the Court for an Order granting a 15 day extension to file objections to the preliminary Presentence Investigation Report. In support of her motion, Defendant states as follows:

1. On April 10, 2013, Sherri Gutierrez appeared before this Court and entered a guilty plea to Counts 1 and 35 of the Indictment.
2. The preliminary Presentence Investigation Report was completed on June 12, 2013. A copy of the preliminary Presentence Investigation Report was provided to counsel on that same day.
3. Objections to the preliminary Presentence Investigation Report are currently due on June 26, 2013.
4. After conferring with counsel, Ms. Gutierrez has expressed a number of concerns regarding the preliminary Presentence Investigation Report. Most importantly, Defendant has questions regarding the accuracy of her reported convictions and their impact on both his offense level and criminal history.

5. Additionally, the defendant has concerns relating to the overall calculation of the statutory guideline range. These concerns are well-founded and merit additional time for investigation and research.

6. Counsel has contacted Mr. Jess Michaelson, the Assistant United States Attorney assigned to this case who indicated that he has no objection to extending the deadline for objections to the preliminary Presentence Investigative Report.

7. This request for an extension of time in which to file objections to the Preliminary Presentence Investigation Report is not intended for dilatory delay, but is sought in truth and fact that the defendant may be granted sufficient time to investigate the allegations made in the preliminary Presentence Investigation Report and to discuss and review any final objections with her court-appointed counsel.

WHEREFORE the defendant, Sherri Gutierrez, respectfully moves this Court for an order extending the deadline in which he can file objections to the Presentence Investigation Report until July 11, 2013.

Respectfully Submitted,

SEYFERTH BLUMENTHAL & HARRIS, LLC

By: /s/ Nickalaus Seacord
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Certificate of Service

I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of the Court on June 26, 2013 by using the CM/ECF system, which will send a notice of electronic filing to all Counsel of Record.

/s/ Nickalaus Seacord
Nickalaus Seacord, MO Bar #63232
Attorney for Defendant