

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

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 11-00046-01-CR-W-ODS
	)	
JAMES ALLEN JACOBS, JR.,	)	
	)	
Defendant.	)	

**APPLICATION FOR CONTINUANCE**

COMES NOW Defendant, James Allen Jacobs, Jr., by and through counsel, Kenton M. Hall, and in accordance with Rule 47, Fed. R. Crim. P., and Rule 7.1(b) and (c) of the Local Rules of Procedure for the United States District Court for the Western District of Missouri, respectfully moves this Court, pursuant to 18 U.S.C. Sec. 3161(h)(8)(A) and (B), to continue trial in the above-captioned cause of action.

**SUGGESTIONS IN SUPPORT OF APPLICATION FOR CONTINUANCE**

1. This matter is set for jury trial on the accelerated criminal trial docket of April 25, 2011. Defendant was arraigned on March 23, 2011. This is the first request for continuance.
2. Defendant stands charged by indictment with five counts: conspiracy to distribute methamphetamine and conspiracy to distribute heroin, in violation of 21 U.S.C. 841(a)(1) and (b)(1)(A) and (B) and 846, possession of a firearm during and in relation to and in furtherance of a drug trafficking crime, in violation of 18 U.S.C. 924(c)(1)(A)(i), felon in possession of a firearm, in violation of 18 U.S.C. 922(g)(1) and 924(a)(2) and Section 2, and conspiracy to launder money, which was proceeds of unlawful activity, in violation of 18 U.S.C. 1956(a)(1)(A)(i) and (h).
3. This request for continuance is made for the following reasons: Counsel for defendant has conferred with the majority of counsel for co-defendants<sup>1</sup>, his client and with Bruce Rhoades, Assistant U.S. Attorney. There are several hundred pages of discovery, with media, to

---

<sup>1</sup> Counsel has been unable to contact counsel for defendant, Amanda Lynn Scates.

review and investigate in order to prepare an adequate defense to the charges. The discovery is being made available to all defendants on March 30, 2011 in the form of computer discs. Due to the large amount of discovery and the seriousness and complexity of the charges, defendant needs additional time to conduct investigation into the charges, locate potential witnesses for the defense and to fully identify and investigate any potential suppression or other pretrial motion issues.

4. Defendant is in custody and does not object to this request.

5. The Government does not object to this request.

6. This request is not made for any purpose of undue delay or to gain strategic advantage but only for the reasons stated herein. Granting this request will serve the ends of justice and ensure that defendant has sufficient time and opportunity to prepare for trial.

**WHEREFORE** Defendant, James Allen Jacobs, Jr., respectfully requests this Court to remove this case from the April 25, 2011 criminal trial docket and, following consultation with counsel for codefendants and the Government, to continue this case to the trial docket of October 24, 2011.

Respectfully submitted,

/s/ Kenton M. Hall  
Kenton M. Hall, MO Bar No. 39212  
Suite 800, 1102 Grand Blvd.  
Kansas City, MO 64106  
816-471-1060  
Fax 816-471-1066  
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application for continuance was served on counsel for the United States and all parties via electronic notification pursuant to local rule on this 30<sup>th</sup> day of March, 2011.

/s/ Kenton M. Hall