

**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.)	

**MOTION FOR ORDER PERMITTING
DEFENDANT TO MARRY**

COMES NOW Defendant, James Allen Jacobs, Jr., by and through counsel, Kenton M. Hall, and moves this Court for permission to marry Rachel Watt.

SUPPORTING FACTS

1. 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).

2. This matter is scheduled for jury trial to commence on October 24, 2011.

3. Mr. Jacobs is in custody at CCA in Leavenworth, Kansas while his case is pending.

4. Mr. Jacobs desires to marry Rachel Watt, 2022 Dewey Avenue, St. Joseph, Missouri 64504, d.o.b. 1/9/1979 and is requesting an Order from this Court allowing him to marry while in custody.

5. No significant governmental interest will be affected by granting defendant's motion.

WHEREFORE Defendant, James Allen Jacobs, Jr., respectfully requests the Court to grant his motion to marry allowing him to marry while in custody.

Respectfully submitted,

/s/ Kenton M. Hall
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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 27th day of April, 2011.

/s/ Kenton M. Hall