

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

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

**DEFENDANT JACOB'S SECOND MOTION FOREXTENSION OF TIME TO FILE
OBJECTIONSTO PSR**

COMES NOW the Defendant, James Allen Jacobs, Jr., by and through his new retained attorney of record, K. Louis Caskey, and respectfully request this Court for an order granting an additional 14 days to file objections to the pre-sentence investigation report. Suggestions in Support of said motion for extension of time are as follows:

1. Counsel entered his appearance on May 18, 2012 which was the day the initial objections to the PSI were due to be filed. Appointed counsel Kent Hall filed an extension of time to file objections to PRS on 17th day of May, 2012. The initial Motion for Extension of Time to File Objections to PSR requested up until June 1, 2012 to file any objections.

2. Counsel has met with the Defendant twice in the last week. Defendant is detained at CCA. As stated in the initial Motion for Extension of Time to File Objections to PSR there are several question of complexity that should be reviewed by new counsel to calculate his offense level and total drug quantities.

3. Counsel needs additional time to review the contents of said file with the Kent Hall as well as the Defendant. An additional 14 days from June 1, 2012 would be adequate.

4. This Application for Extension of Time to make any objection is made in good faith on the grounds stated herein

WHEREFORE, Defendant respectfully prays this Court to grant an additional 14 days to file any objections to pre-sentence investigation report in the above captioned matter which would include June 15, 2012.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on May 30, 2012, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

K. Louis Caskey