

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 11-00046-09-CR-W-BCW
)	
RICHARD M. GANGEL,)	
)	
Defendant.)	

**MOTION FOR EXTENSION OF TIME
TO FILE CORRECTIONS AND OBJECTIONS TO PRESENTENCE REPORT**

COMES NOW Richard M. Gangel, by and through appointed counsel, and requests that he be given an extension of time of fourteen (14) days to file objections and corrections to the preliminary presentence report, in support of which is offered the following:

1. Mr. Gangel entered a change of plea on February 9, 2012, to conspiracy to distribute a controlled substance, in violation of 21 U.S.C. §841(a)(1) and (b)(1)(B); and money laundering, in violation of 18 U.S.C. §1956(a)(1)(A)(i) and (h).
2. On June 4, 2012, the probation office filed its preliminary presentence report.
3. The deadline to file objections to the preliminary report is June 18, 2012.
4. Due to scheduling issues, including preparing for and making two oral arguments at the Eighth Circuit Court of Appeals in St. Louis, Missouri, undersigned counsel has not had the opportunity to travel to the detention facility at which Mr. Gangel is detained.
5. Although undersigned counsel briefly spoke by telephone with Mr. Gangel concerning the preliminary report, adequate representation in this case will require counsel to meet with Mr. Gangel in person to discuss the presentence report.
6. An extension of the deadline by fourteen (14) days should be adequate to permit

counsel to meet with Mr. Gangel and to draft any objections or corrections to the report.

WHEREFORE, defendant Richard M. Gangel moves that the deadline to file objections or corrections to the preliminary presentence report be extended to July 2, 2012, and for such other relief as the Court deems reasonable and just.

Respectfully Submitted,

/s/ John G. Gromowsky

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically via the Court's CM/ECF Filing System, this 18th day of June, 2012, upon counsel for all parties:

/s/ John G. Gromowsky

Attorney for Defendant