

**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 EXTENSION OF TIME
TO FILE OBJECTIONS TO PSR**

COMES NOW Defendant, James Allen Jacobs, Jr., by and through counsel, Kenton M. Hall, and respectfully requests an Order extending the deadline in which to file objections to the pre-sentence investigation report (PSR). In support, defendant submits the following suggestions:

1. Defendant received the preliminary PSR on May 4, 2012. Objections are due no later than May 18, 2012. Sentencing has been scheduled for July 31, 2012.
2. Defendant requests an additional fourteen (14) days, or until June 1, 2012, to file his written objections to the PSR. This request is made for the following reasons: Although counsel has met with his client to review the preliminary PSR and to note possible objections, due to the complexity of the sentencing calculations contained therein, including drug quantities and enhancements that have been applied, counsel and client were unable to fully review the entirety of the PSR at the initial meeting, which lasted approximately two hours. Another meeting has been scheduled for May 21, 2012, to complete review of the PSR.
3. In addition, defendant disputes that he is responsible for certain drug transactions that are attributed to him in the PSR and which may affect the total drug quantities used to calculate his offense level. Defendant believes he was actually hospitalized for severe burn injuries suffered during a motorcycle traffic accident during a portion of the period of time in which he is alleged, in the PSR, to have distributed certain quantities of drugs. Defendant believes that, due to his hospitalization, he would have been physically incapable of conducting those alleged drug

transactions. As a result, counsel needs additional time to secure a copy of defendant's medical records from KU Medical Center in Kansas City, Kansas to investigate the nature of defendant's injuries and the period of hospitalization. Defendant believes he can secure the medical records in a timely manner if granted an additional fourteen days to file objections to the PSR.

6. Counsel has advised the Assistant U.S. Attorney, Bruce Rhoades, and there is no objection to this request.

WHEREFORE Defendant respectfully requests that the deadline to file objections to the preliminary PSR be extended to June 1, 2012.

Respectfully submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that the foregoing request for extension of time was served on counsel for the United States and all parties via electronic notification pursuant to local rule on this 17th day of June, 2012.

/s/ Kenton M. Hall
ATTORNEY FOR DEFENDANT