

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

UNITED STATES OF AMERICA,
Plaintiff,

VS.

JOHNNY SMITH,
Defendant.

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NO. 11-00046-02-CR-W-ODS

**FIRST MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS TO PRELIMINARY PRESENTENCE REPORT**

Defendant Johnny Smith moves the Court for an extension of time until June 25, 2012, to file objections to the preliminary presentence report, and in support states:

1. Mr. Smith and his counsel have met and reviewed the preliminary presentence report. Counsel believes an additional meeting is necessary and beneficial to drafting potential objections. The factual basis of the preliminary presentence report is lengthy and takes a considerable amount of time for review.

2. Objections were originally due June 4, 2012. Counsel did not anticipate objections, but after further review, counsel contacted the Probation Officer and indicated that additional time is needed to consider and evaluate potential objections to the report.

3. Counsel made this request known to the Probation Officer who prepared the report. Counsel is unaware of any reason why the United States would have any objection or issue with this request.

For the foregoing reasons, Mr. Smith prays the court to extend the time for filing objections to the preliminary presentence report until June 25, 2012.

Respectfully submitted,

/S/ DANA M. ALTIERI

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ATTORNEY FOR DEFENDANT

CERTIFICATE REGARDING SERVICE

I hereby certify that it is my belief and understanding that counsel for plaintiff, and counsel for the co-defendants in this matter are participants in the Court's CM/ECF program and that separate service of the foregoing document is not required beyond the Notification of Electronic Filing to be forwarded on June 11, 2012 upon the filing of the foregoing document.

/s/ Dana M. Altieri

DANA M. ALTIERI