

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

UNITED STATES OF AMERICA                    )  
  )  
  Plaintiff,    )  
  )  
  v.            ) No. 09-00157-06-CR-W-DW  
  )  
BLAKE FOLSOM,                                )  
  )  
  Defendant.    )

MOTION BY DEFENDANT FOLSOM FOR EXTENSION OF  
TIME TO FILE OBJECTIONS TO PRESENTENCE  
INVESTIGATION REPORT

Defendant Folsom hereby moves the Court for an extension of  
time to file objections to the Presentence Investigation Report.

As grounds therefore, the Defendant states:

1. Any objections are currently due August 5, 2010
2. Defendant is incarcerated and counsel needs additional  
time to consult with defendant about issues in the draft report.  
It is anticipated there will be objections focusing on  
defendant's criminal history.

3. Counsel asks until August 27, 2010 to file any objections  
to the Presentence Investigation Report.

4. Defendant and counsel further waive the sentencing date  
as delineated in Local Rule 99.8.

WHEREFORE, Defendant through counsel, moves the Court to  
extend the time for filing any objections to the Presentence

Investigation Report until August 27, 2010 and waives the time for sentencing under Local Rule 99.8.

Respectfully submitted,

/s/  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was caused to be served on all defense attorneys of record via electronic filing system on Wednesday, August 04, 2010, and on counsel for the government:

Bruce A. Rhoades  
US Attorney's Office  
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Kansas City, MO 64106

Atty for United States

/s/  
JOHN R. OSGOOD