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

UNITED STATES OF AMERICA,)
Plaintiff,))
v.)
TIMOTHY JAY GREATHOUSE,)
Defendant.)

Case No. 09-00157-04-CR-W-SOW

MOTION FOR EXTENSION OF TIME TO FILE DEFENDANT'S OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT

COMES NOW Defendant, Timothy Jay Greathouse, by and through his counsel of record, Daniel J. Ross, and respectfully requests the Court for an extension of time to file Defendant's objections to the Presentence Investigation Report.

SUGGESTIONS IN SUPPORT

That Defendant's objections to the PSI report were due September 7, 2010. The PSI is lengthy and includes numerous entries for the Defendant's criminal history, therefore counsel is in need of an additional thirty days to conclude the review, meet with the defendant and complete any objections necessary. This is counsel's first request for extension of time.

WHEREFORE, defendant respectfully requests an additional thirty days to file Defendant's objections to the Presentence Investigation Report.

Respectfully submitted,

DANIEL ROSS, LLC

By: /s/Daniel J. Ross_____

Daniel J. Ross MO Bar#28155 600 East 8th Street, Suite A Kansas City, Missouri 64106 (816) 931-5000 FAX (816) 753-5051 danielrossllc@gmail.com **ATTORNEY FOR DEFENDANT**

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was electronically filed via the Federal CM/ECF System and electronic notification was simultaneously sent this 8th day of September 2010 to the following:

United States Attorney's Office

/s/Daniel J. Ross ____

Attorney for Defendant