

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

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 11-00157-CR-W-SOW
	)	
TONY P. CASTRO,	)	
	)	
Defendant.	)	

**MOTION FOR EXTENSION OF TIME  
TO FILE PRETRIAL MOTIONS  
WITH SUGGESTIONS IN SUPPORT**

Comes now Defendant and moves this court to grant defendant until November 1, 2011 to file pretrial motions. In support of this motion defendant states:

1. Defendant is charged with conspiracy to distribute controlled substances and, if convicted, he faces substantial incarceration.
2. Pretrial motions are due August 4, 2011.
3. Trial has been continued to March 19 2012.
4. Counsel for defendant was appointed in late July 2011 and did not have his initial meeting with Defendant until his arraignment.
5. Defendant has yet to receive discovery from the Government, but the Government has indicated the discovery is forthcoming.

6. ASUA Ambrose does not object to a continuance to file pretrial motions

7. Granting this request for an extension of time to file pretrial motions is necessary to ensure defendant's 6th Amendment rights to effective assistance of competent counsel are met.

8. Granting additional time to file pre-trial motions should not disrupt the trial schedule and would serve the interests of justice.

WHEREFORE, defendant moves the Court enter an order extending the deadline to file pretrial motions to November 1, 2011 .

Respectfully submitted,

/s/

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Counsel for TONY P CASTRO

#### CERTIFICATE OF SERVICE

I certify that a copy of this pleading has been caused to be served on the Assistant United States Attorney for Western District of Missouri and other ECF listed counsel through use of the Electronic Court Document Filing System on Wednesday, August 03, 2011.

/s/

JOHN R. OSGOOD