

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 10-CR-00320-05-DGK</b>
	)	
<b>ROBERT OLVERA,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION FOR SENTENCING HEARING**

COMES NOW Defendant, by counsel, and moves the Court for its Order setting the sentencing hearing on this case on the soonest date possible for the Court. In support thereof, Defendant respectfully suggests that:

1. Defendant has been in custody since November 19, 2010.
2. Defendant entered his plea of guilty on March 7, 2012.
3. The final PSR was filed in this case on July 17, 2012.
4. The final PSR has concluded that the sentencing guidelines suggest a range of 24-30 months.
5. Counsel understands that the Court typically likes to sentence individuals in a large case such as this once all individuals are ready to be sentenced.

6. Counsel believes that this case is worthy of an exception based on the fact that at the date of this filing the defendant has already served nearly 25 months in custody.

7. Counsel has discussed this request with AUSA Bruch Rhoades and he has informed Counsel that the Government takes no position regarding this request.

WHEREFORE, Defendant, through counsel, moves the Court for its Order setting the sentencing for this matter on the next available date convenient to the Court.

//s// Mark A. Thomason  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12<sup>th</sup> day of December, 2012, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Mark A. Thomason  
*Counsel for Defendant*