

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

UNITED STATES OF AMERICA,
Plaintiff,

vs.

Case No. 10-00320-16-CR-W-DGK

FRANK ALVAREZ,
Defendant.

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

Defendant Frank Alvarez moves the court for an extension of time until January 18, 2013, to file objections to the preliminary presentence report, and in support states:

1. Counsel has reviewed the preliminary presentence report.
2. Objections were due January 4, 2013.
3. Additional time is needed to investigate potential issues with the report, and to draft objections. Counsel for defendant has been out of town a significant amount of time between when the report was completed and when the objections were due. In addition, counsel made arrangements to see the defendant who, unbeknownst to counsel, had been transferred from the facility.
4. Counsel for defendant has not contacted counsel for the United States, but is unaware of any reason why the United States would have an objection to this request.

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For the foregoing reasons, Mr. Frank Alvarez prays the court to extend the time for filing objections to the preliminary presentence report fourteen days, until January 18 2013.

Respectfully submitted,

/S/ DANA M. ALTIERI

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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 January 6, 2013 upon the filing of the foregoing document.

/s/ Dana M. Altieri

DANA M. ALTIERI