

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 10-00320-16-CR-W-DGK
MARIA MARRON,	)	
	)	
Defendant.	)	
	)	

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

COMES NOW Defendant, Maria Marron, by and through her counsel, Adam M. Crane, and respectfully requests the Court to extend the deadline within which to file objections to the pre-sentence investigation report (PSR) in this case for a period of ten (10) days from the filing of this motion.

IN SUPPORT of this motion, Defendant states as follows:

1. Defendant received the preliminary PSR on January 3, 2013 via email sent to defendant's counsel. Objections were due no later than January 17, 2013. Sentencing has not yet been scheduled.
2. On October 16, 2012, Defendant entered a guilty plea to a lesser included offense in Count I of the Information pursuant to a Plea Agreement. The defendant was allowed to continue to remain on bond under court supervision.
3. After speaking with the Defendant, counsel has learned that Defendant has some questions and issues regarding several potential objections but has not been able to meet with her as she has had some recent health issues.
4. Counsel has advised the Assistant U.S. Attorney, Bruce Rhoades, of this request via telephone message to respond if there is any objection but is unaware of any reason why the United States would have an objection to this request.

WHEREFORE, Defendant prays that this Court grant an extension until January 30, 2013 in which Defendant may file any objections to the preliminary PSR.

Respectfully submitted,

/s/ Adam M. Crane  
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ATTORNEY FOR DEFENDANT MARIA MARRON

CERTIFICATE OF SERVICE

I hereby certify that on this 16<sup>th</sup> day of January, 2013, the foregoing Motion for Extension of Time to file Objections to the PSR was served on counsel for the United States and all parties via electronic notification pursuant to local rule. It is my belief that counsel for Plaintiff and counsel for co-defendants in this matter are participants in the Court's CM/ECF program and that separate service of the foregoing document are not required beyond the Notification of Electronic Filing to be forwarded upon filing.

/s/ Adam M. Crane  
Adam M. Crane