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

UNITED STATES OF AMERICA,)
Plaintiff,)))
v.	Case No: 10-00320-15-CR-W-DGK
JOSEPH MICHAEL LOPEZ,)
Defendant.))

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS AND RESPONSES TO PRESENTENCE INVESTIGATION REPORT

Defendant, Joseph Michael Lopez, by and through counsel, respectfully moves this Court for a 30-day extension of time, up through and including Monday, February 25, 2013, within which to file his objections or otherwise respond to the Presentence Investigation Report (PIR). In support of this motion, Mr. Lopez respectfully states:

- 1. On October 17, 2012, Mr. Lopez pled guilty to the lesser included charge in count one of the Indictement charging him with a violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B), 846, and count two, 18 U.S.C. §§1956(a)(1)(A)(i), (h).
 - 2. On January 11, 2013, the preliminary PIR was prepared.
- 3. The deadline for Mr. Lopez to file objections or otherwise respond to the PIR is January 25, 2013.
 - 4. Mr. Lopez is currently located in Caldwell County, Missouri.
- 5. A 30-day extension of time is needed to permit Mr. Lopez to consult with counsel, verify the accuracy of the information in the PIR, and to permit Mr. Lopez to conduct research and file a proper response.

- 6. The Assistant U.S. Attorney was contacted and indicated no objection to the requested extension.
 - 7. This motion is not made for the purpose of delay.

WHEREFORE, Defendant Joseph Michael Lopez requests that this Court enter an Order extending by 30 days, up through and including, February 25, 2013, the time within which to respond to the Presentence Investigation Report.

Respectfully Submitted,

ARMSTRONG TEASDALE LLP

BY: /s/ Dione C. Greene

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ATTORNEY FOR DEFENDANT JOSEPH MICHAEL LOPEZ

CERTIFICATE OF SERVICE

This is to certify that on January 22, 2013 a true and accurate copy of the above and foregoing was e-filed with the Court using the CM/ECF system which sent notification to all parties entitled to service.

/s/ Dione C. Greene