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

UNITED STATES OF AMERICA,	
Plaintiff,	) )
v.	) Case No. 10-00320-10-CR-W-DGK
	)
MARCO MURSIA,	)
	)
Defendant.	)

## <u>DEFENDANT'S SECOND MOTION FOR EXTENSION OF TIME</u> <u>TO FILE OBJECTIONS</u>

Comes now the Defendant, Marco Mursia, by and through counsel, Angela C. Hasty, and for her Second Motion for an Extension of Time does hereby inform the court as follows:

- On October 17, 2012 Mr. Mursia plead guilty in front of the Honorable Judge Greg Kays.
- A presentence report was prepared and sent to counsel for Mr. Mursia on January 3, 2013.
- 3. The objections to the presentence report are currently due on February 15, 2013.
- 4. Counsel has meet with her client and reviewed the presentence report with him. However, based on that meeting, counsel needs additional time to research various issues in order to prepare the objections to the presentence report.

- 5. Counsel is requesting an extension of time to prepare the objections to the presentence report.
- 6. Counsel is requesting an additional 30 days, until March 15, 2013, to research and prepare objections to the presentence report.
- 7. Counsel has spoken with Assistant United States Attorney, Bruce Rhodes, who has no objection to this continuance.
- 8. This motion is not made to delay or vex the court, but in the interest of seeking justice.

Wherefore, for the foregoing reasons, Defendant respectfully requests this Honorable Court grant a motion for an extension of time to file objections to the presentence report until March 15, 2013, or to a time it deems just and proper.

Respectfully submitted,

LAW OFFICE OF ANGELA HASTY, LLC

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## **CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2013, the undersigned filed the foregoing with the clerk of the court by using the CMF/ECF system which will send a notice of the electronic filing to all counsel of record.

/s/ Angela C. Hasty\_\_\_\_