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

UNITED STATES,)
)
Plaintiff,)
)
vs.) No.
)
)
JUAN MARRON,)
)
Defendant.)

No. 10-000320-01-CR-W-DGK

MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO PSI

Comes now Defendant, by and through appointed counsel and hereby moves this Honorable Court to grant an extension of time to file Objections to Preliminary PSI, up to and including March 18, 2013.

Suggestions in Support of Motion

1. Defendant's preliminary PSI has been completed and distributed to counsel and Defendant.

2. Counsel met with Defendant and went over the draft PSI.

3. There are some issues that need further investigation and research to determine if objections are appropriate.

4. Counsel has been unable to complete this investigation and research as

she was ill for the past ten days.

5. Counsel states that granting this extension will not prejudice either party as the sentencing in this case are all being scheduled in June 2013.

WHEREFORE for the above stated reasons, defendant requests this Honorable Court grant an extension of time up to and including March 18, 2013, in which to file Objections to the preliminary PSI.

Respectfully submitted,

/	's/	

Susan M. Hunt 1600 Genessee Suite 806 Kansas City, MO. 64106 (816) 221-4588

I hereby certify that on March 11, 2013, the forgoing was filed in the Court's electronic filing system and a copy electronically served on all parties.

/s/ Susan M. Hunt