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

```
UNITED STATES OF AMERICA, )
    Plaintiff, )
    v. )
RAFAEL ZAMORA )
    Defendant. )
```


## MOTION FOR EXTENSION OF TIME TO SUBMIT OBJECTIONS TO <br> THE PRELIMINARY PRESENTENCE INVESTIGATION REPORT

The defendant, Rafael Zamora, by counsel, hereby respectfully moves this Court for an extension of time of 30 days or until September 6, 2013, in which to submit objections to the preliminary presentence investigation report.

## SUPPORTING SUGGESTIONS

Mr. Zamora's objections to the preliminary presentence investigation report are due by August 8, 2013.

I need the additional time being requested by this motion to meet with Mr. Zamora and then prepare and submit appropriate objections to the report.

AUSA Bruce Rhoades has been contacted via e-mail inquiring as to whether he has any objection to the granting of this motion and I anticipate his response on Monday, August 5, 2013.

This motion is not being made to delay these proceedings and if granted, will not unduly prejudice the parties, but instead do substantial justice.

WHEREFORE, Mr. Zamora respectfully prays that this motion be granted.

Respectfully submitted,
/s/
E. Eugene Harrison

Missouri Bar \# 26923
Kansas Bar \# 6980
5400 Johnson Drive, Suite 153
Mission, Kansas 66205-2912
8165504289
eharrison@kc.rr.com

## CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which electronically served all parties.
/s/
E. Eugene Harrison

