

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Criminal Action No.
v.)	10-00320-14-CR-W-DGK
)	
RAFAEL ZAMORA,)	
)	
Defendant.)	

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

The defendant, Rafael Zamora, by counsel, hereby respectfully moves this Court for a second extension of time of 15 days or until June 15, 2011, in which to file his pretrial motions.

SUPPORTING SUGGESTIONS

Mr. Zamora's pretrial motions currently are to be filed by June 1, 2011.

The trial has been set in this matter to start on September 12, 2011.

A review of the government's evidence has revealed one issue that Mr. Zamora may wish for the Court to review through pretrial motion practice. Mr. Zamora has made substantial progress in the formulation of this issue, but needs the additional time being requested by this motion to further review the issue identified with counsel and to finalize the content of the motion.

AUSA Bruce Rhoades does not object to the granting of this motion.

The granting of this motion should not disrupt the trial schedule.

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

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

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2011, 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