

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

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
 v.) Criminal Action No.
) 10-00320-19-CR-W-DGK
 MUHAMMAD IBRAHIM ROLLIE,)
)
 Defendant.)

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

Comes now Defendant Muhammad Rollie (“Rollie”) and moves this court grant Rollie until June 30, 2011 to file pretrial motions. In support of this motion Rollie states:

1. Rollie is one of 19 defendants charged with conspiracy to distribute cocaine, crack cocaine and marijuana in violation of 21 U.S.C. 841 and 21 U.S.C. 846. The defendants are also charged with conspiracy to conduct financial transactions involving proceeds of unlawful drug activity in violation of 21 U.S.C. 841, 21 U.S.C. 846 and 18 U.S.C. 1956.

2. Pretrial motions are due June 1, 2011.

3. Trial has been set for September 12, 2011.

4. Defendant and the Government are currently resolving evidentiary issues, which have an impact on discovery and potential pretrial motions. As such, Defendant needs additional time before filing pretrial motions.

5. Granting this request for a second extension of time to file pretrial motions is necessary to ensure that Rollie’s 6th Amendment rights to effective assistance of competent counsel are met.

6. Granting Rollie this additional time to file pre-trial motions should not disrupt the trial schedule and would serve the interests of justice.

7. AUSA Bruce Rhoades does not object to Rollie's 2nd request for additional time to file pretrial motions.

WHEREFORE, Rollie respectfully moves this Court enter an order extending the deadline to file pretrial motions from June 1, 2011 to June 30, 2011 or for whatever other relief this court deems just and proper.

Respectfully submitted,

/s/ Michael L. Barrera (40998)

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion was served on AUSA Bruce Rhoades and all defense attorneys of record by CM/ECF this 31st day of May 2011.

/s/Michael L. Barrera