

**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.)	

**RAFAEL ZAMORA’S MOTION FOR AN ENLARGEMENT OF TIME
WITH SUPPORTING SUGGESTIONS**

The defendant, Rafael Zamora, hereby respectfully moves this Court for an enlargement of time of twenty-one days, to Monday, October 24, 2011, in which to object to the Court’s September 19, 2011, report and recommendation to deny Rafael Zamora’s motion to suppress. The objections are currently due by Monday, October 3, 2011.

SUPPORTING SUGGESTIONS

As requested by the Court that all counsel should make attempts to economize where possible in their representation, a copy of the transcript of the hearing was not ordered until it became necessary. Counsel has now initiated that process. Also, counsel has already scheduled out-of-town travel plans for the present period in which to respond.

Counsel needs the additional time being requested by this motion to obtain the transcript, confer with Mr. Zamora, and prepare and file the objection.

This motion is not being made for the purpose of delay. The granting of this motion should not unduly prejudice the parties to this action and should do substantial justice.

The government does NOT concur in the granting of this motion.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 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