

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

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

**GOVERNMENT’S RESPONSE TO
DEFENDANT RAFAEL ZAMORA’S MOTION FOR EXTENSION
OF TIME TO FILE OBJECTIONS TO REPORT AND RECOMMENDATION**

The United States of America, by Beth Phillips, United States Attorney, and the undersigned Assistant United States Attorney, both for the Western District of Missouri, respectfully submits this response to the defendant’s motion, Document number 335, filed September 21, 2011, for more time to file objections to Chief United States Magistrate Judge Robert E. Larsen’s Report and Recommendations, filed September 19, 2011.

While the Government does not wish to obstruct the defendant’s rights or impact in any manner the personal life of the defense attorney, as noted in the defense motion, the Government does not concur that there is a need for additional time to file objections to the aforementioned report and recommendations. Firstly, the issues are not complicated. Secondly, due to the completeness of Judge Larsen’s Report and Recommendations, any objections the Defense could possibly come up with could be made from the facts, law and references to the hearing and transcript in the report itself. Finally, even if a transcript is necessary, the Government believes a copy of the transcript was filed in the case on August 3, 2011, as Document 309.

For the foregoing reasons, the United States respectfully requests that the Court deny the defendant's motion to extend the time to file objections to Chief United States Magistrate Judge Robert E. Larsen's Report and Recommendations.

Respectfully submitted,

Beth Phillips
United States Attorney

By */s/ Bruce Rhoades*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on June 22, 2011, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

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/s/ Bruce Rhoades

Bruce Rhoades
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