

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

UNITED STATES OF AMERICA,
Plaintiff,

vs.

Case No. 09-00121-12-CR-W-DGK

NATHAN MCKEE,
Defendant.

**MOTION TO EXTEND DEADLINE TO FILE OBJECTIONS TO PSR
AND SUGGESTIONS IN SUPPORT**

The defendant Nathan McKee, by and through his attorney Melanie S. Morgan, moves this Court for an Order extending the deadline in which to file objections to the presentence investigation report until August 16, 2011. In support of thereof, the following suggestions are offered:

1. The draft PSR in this case has been prepared and disclosed to the parties with an initial objection deadline of August 2, 2011.
2. Due to other professional obligations including out of state travel, counsel has been unable to complete review of the PSR with Mr. McKee.
3. Counsel is requesting a two week extension of time in which to review the PSR with her client and submit any necessary objections.
4. Counsel anticipates that this case will not be ready to proceed to sentencing until late October 2011 so that both parties can take full advantage of provisions within the plea agreement.
5. Counsel has discussed this extension of time with Mr. Bruce Rhoades, Assistant United

States Attorney, and he has no objection.

Respectfully Submitted,

/s/ Melanie S. Morgan

Melanie S. Morgan, Bar No. 90

MORGAN PILATE LLC

142 N. Cherry Street

Olathe, KS 66061

Telephone: 913-829-6336

Facsimile: 913-829-6446

Attorney for Nathan McKee

CERTIFICATE OF SERVICE

I, Melanie S. Morgan, do certify that a true and accurate copy of the foregoing motion was served electronically pursuant to the ECF system on all counsel of record on this 2nd day of August, 2011.

/s/ Melanie S. Morgan