

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

UNITED STATES OF AMERICA §
VS. § 4:08-CR-00026
TROY R. SOLOMON §

UNOPPOSED

MOTION TO EXTEND DEADLINE TO FILE OBJECTIONS TO PSR

TO THE HONORABLE JUDGE FERNANDO GAITAN:

COMES NOW, TROY SOLOMON, the Defendant in the above captioned cause requests that this Honorable Court extend the time for filing objections to Presentence Investigation Report. According to the local rules, objections to the PSR would be due today, September 30, 2010.

Due to unforeseen medical issues, undersigned counsel will be precluded from working a normal schedule over the next three weeks. Counsel will be undergoing extensive in-patient tests under the supervision of his cardiologist. As there is no set time table for his return to work, counsel wants to ensure he has ample time to properly represent Mr. Solomon through the sentencing process.

Counsel has discussed with all parties - all parties have no objection to this request. Counsel will keep this Court, the Government and the Probation Department updated on his medical status.

WHEREFORE, PREMISES CONSIDERED, the Defendant requests that this Honorable Court grant this Motion to Extend Deadline to file Objections.

Respectfully submitted,

/s/ Chip Lewis

CHIP B. LEWIS
2120 Welch
Houston, Texas 77019
(713) 523-7878
(713) 523-7887 (Fax)
TBC# 00791107
FEDERAL I.D. #24313
ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I, Chip Lewis, do hereby certify that on the 30th day of September 2010, I communicated with Curt Bohling, Assistant United States Attorney, and with Susan Richart, United States Probation, they are unopposed to this motion.

/s/ Chip Lewis
CHIP LEWIS

CERTIFICATE OF SERVICE

I, Chip Lewis, do hereby certify that on the 30th day of September, 2010 a true and correct copy of the foregoing Unopposed Motion to Extend Deadline to file Objections was delivered via ECF Filing to Rudolph Rhodes, Assistant United States Attorney.

/s/ Chip Lewis
CHIP LEWIS