

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

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08-00026-04-CR-W-FJG
	)	
CHRISTOPHER L. ELDER,	)	
	)	
	)	
Defendant.	)	

**MOTION TO CONTINUE DEFENDANT’S SENTENCING  
FROM APRIL 22, 2011 TO A DATE PRIOR TO MAY 16, 2011  
WITH SUGGESTIONS IN SUPPORT**

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**COMES NOW** defendant Elder and moves the Court to continue the presently scheduled sentencing for a period of not less than 14 days but in no event greater than 21 days. As grounds, defendant states:

1. Defendant is presently set for sentencing on Friday, April 22, 2011. Defendant’s *Gall* memorandum is due today, April 7, 2011. Counsel for defendant has been gathering information for his memorandum, conducting research, and doing other things in preparation for sentencing but has not completed all tasks as of this date and needs additional time to prepare his memorandum and prepare for the sentencing hearing.

2. Counsel has discussed this matter with AUSA Rudolph Rhodes and he has no objection to a continuance so long as the sentencing is set prior to May 16, 2011, the date presently scheduled for defendant Solomon.

3. A 14 day continuance would call for a May 6<sup>th</sup> hearing date and a 21 day continuance would result in a May 13<sup>th</sup> date. Defense counsel's only conflicting date between now and May 13<sup>th</sup> is a suppression hearing before Judge Maughmer set for May 5, 2011 at 1:30 p.m. in *United States v. Richardson*, 10-00303-CR-W-GAF.

WHEREFORE, defendant requests his sentencing be continued to a date prior to May 16, 2011 but in no event for a period of less than 14 days.

/s/

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#### CERTIFICATE OF SERVICE

I certify that a copy of this pleading has been caused to be served on the Assistant United States Attorney for Western District of Missouri and other ECF listed counsel through use of the Electronic Court Document Filing System Thursday, April 07, 2011.

/s/

JOHN R. OSGOOD