

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	Case No. 08-00026-02-CR-W-FJG
)	
CYNTHIA MARTIN,)	
Defendant.)	

**DEFENDANT CYNTHIA MARTIN'S
MOTION FOR CONTINUANCE**

COMES NOW defendant, Cynthia Martin, by and through her counsel of record, pursuant to Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully moves the Court for a continuance of the trial setting in this matter to the joint criminal trial docket on January 5, 2009 or January 12, 2009. This matter is currently set on the September 29, 2008 criminal docket. As grounds for this Motion, counsel submits the following Memorandum in Support:

MEMORANDUM IN SUPPORT

1. The defendant is charged in six counts of a 24-count indictment containing a forfeiture allegation, with conspiracy to distribute controlled substance in violation of 21 U.S.C. § 841(a)(1), conspiracy to commit promotional/concealment money laundering in violation of 18 U.S.C. § 1956(h), four counts of concealment money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(I), and a forfeiture allegation pursuant to 21 U.S.C. § 853. On February 21, 2008, Ms. Martin appeared and was released on an ROR bond.

2. A significant amount of additional discovery, including documents contained on five (5) CD's as well as additional documents have recently been produced by the government. These documents need to be reviewed by counsel for each defendant. Furthermore, certain additional witnesses need to be contacted for an attempt to interview them. More time to complete additional investigation is necessary in order to render effective assistance of counsel. Additionally, new counsel for defendant Soloman have filed an entry of appearance in this matter during the week of August 18, 2008.

3. There are also certain pending motions before the court and leave has been requested to file additional motions. As a result of the legal and factual issues which need to be more fully analyzed by counsel and, in some instances, ruled by this Honorable Court, a continuance of the trial setting and accompanying pretrial conference is requested. This continuance will also allow the defendants to be more fully prepared for trial. It is requested that this matter be set over to the criminal docket commencing the weeks of January 5 and January 12, 2009.

4. Each counsel for each party (except for Mr. Johnson) has been contacted as to this request to continue this matter to the docket commencing the weeks of January 5 and January 12, 2009. Each contacted party has no objection to this request for a continuance although counsel for defendant Soloman respectfully suggests that his preference is for the trial to commence the second week of the January 2009 criminal docket.

5. Defendant Martin acknowledges and waives her right to a speedy trial. A

The undersigned hereby certifies that on the 25th day of August, 2008, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ James R. Hobbs
Attorney for Defendant Martin