

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

UNITED STATES OF AMERICA,            )  
  )  
  Plaintiff,            )  
  )  
  v.                                No. 10-00162-17-CR-W-FJG  
  )  
ANDREYA JONES,                         )  
  )  
  Defendant.            )

**DEFENDANT JONE’S UNAPPOSED MOTION FOR  
AN EXTENSION OF TIME WITHIN WHICH TO FILE  
PRETRIAL MOTIONS AND SUGGESTIONS IN SUPPORT**

Comes now the defendant, through her attorney Nickalaus Seacord, and does hereby move the Court for its order granting an extension of thirty days in which to file pretrial motions as provided by Rule 12 (e), Title 18A, United States Code.

**SUPPORTING SUGGESTIONS**

This request is being made to provide defense with the reasonable time necessary to provide effective counsel as guaranteed by the Sixth Amendment. 18A, Rule 12 (c), United States Code, provides that the Court may, at the arraignment or as soon after as practicable, set a deadline for pretrial motions. However, Title 18A, Rule 12 (e), United States Code, provides that a party waives any Rule 12 (b) (3) defense, objection or requests, not raised by the deadline set, *or by any extension the Court provides.*

Here, Andrey Jones is charged in a complex case. There are twenty-three defendants and seventeen counts in the Indictment. Ms. Jones is named in Count One of the Indictment, alleging that between the dates of July 1, 2009 and May 26, 2010, she was a member of a conspiracy to distribute over five kilograms of cocaine and over 50 grams of crack. This charge

exposes the defendant to a sentence of not less than ten years and not more than life imprisonment, a fine of not more than \$4,000,000 and a supervised release of not less than five years.

Defendant's counsel, Nickalaus Seacord, is a sole practitioner, who was named to the case on Nov. 8<sup>th</sup>, 2010. The government has thus far provided the defendant with discovery discs which contain over 10,000 pages of investigative reports, wiretap transcripts, and numerous photographic and video surveillance materials. In addition, Andrey Jones is being detained at the St. Clair County Jail in Osceola, MO pending trial on February 14<sup>th</sup>, 2010. In order to meet personally with counsel to discuss the case, a four hour round trip is required.

The defendant has reached out to attorneys for the government and they have expressed no objections to a thirty day extension of time for filing pretrial motions.

BASED on the reasons set forth within, Andrey Jones requests that the deadline for pretrial motions be extended an additional thirty days.

Respectfully Submitted,

/s/ Nickalaus Seacord

---

Nickalaus Seacord  
1308 NE Windsor Drive  
Lee's Summit, MO 64086  
P: (816) 434-7301  
F: (816) 875-2388  
[nick@seacordlaw.com](mailto:nick@seacordlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18<sup>th</sup>, 2010, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the attorneys of record and mailed to any non-participating attorneys in Electronic Case Filing.

/s/ Nickalaus Seacord