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

UNITED STATES OF AMERICA,		)
	Plaintiff,	)
<b>v.</b>		)
DELBERT ROBERSON,		)
	Defendant.	)

No. 10-cr-00162-FJG

## <u>MOTION TO EXTEND TIME FOR FILING OBJECTIONS</u> TO PRELIMINARY PRESENTENCE INVESTIGATION REPORT (PSR)

COMES NOW Defendant, by counsel Phillip R. Gibson, and moves the Court for its order extending the time for him to file objections to the PSR. In support thereof, defendant respectfully suggests that:

1. The PSR became available to counsel on August 12, 2011. Because of family obligations regarding the death of an aunt that counsel was caring for, counsel has been unable to visit with Defendant in person regarding the PSR. In fact, Defendant has not yet seen the PSR.

2. Today, August 26, 2011, is when the objections would normally be due. Counsel ten days until September 6, 2011, would give counsel time to visit with Defendant and formulate any necessary objections.

3. Counsel has spoken with AUSA Brent Venneman regarding this motion and has been advised that the Government has no objection thereto.

WHEREFORE, Defendant moves the Court for its order permitting him to file objections to the PSR on or before September 6, 2011.

//s//Phillip R. Gibson Phillip R. Gibson, Bar No. 28610 THOMASON & GIBSON LLC 1200 N.W. South Outer Rd., Ste. 302 Blue Springs, MO 64015 816.229.8686/ 816.229.9494 fax Counsel for Defendant

## CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of August, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

<u>/s/ Phillip R. Gibson</u> Counsel for Defendant