

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>No. 10-cr-00162-FJG</b>
	)	
<b>DELBERT ROBERSON,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION TO EXTEND TIME FOR FILING OBJECTIONS  
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 until September 20, 2011. In support thereof, defendant respectfully suggests that:

1. The PSR became available to counsel on August 12, 2011. On August 26, 2011, Defendant moved for and was granted an extension of time to file objections to the PSR.
2. Since that date, counsel has had an opportunity to meet with the Defendant in person and has conducted investigation regarding Defendant's criminal history which is essential to the process of developing objections to the PSR. However, having now completed that investigation, counsel has not had an opportunity to again visit with Defendant to reach an agreement with him on what, if any, objections should be made. Counsel plans to meet again with Defendant on either September 15<sup>th</sup> or 16<sup>th</sup>, depending on the availability of meeting rooms at the detention center.
3. Defendant is in custody and is not likely to be sentenced for some time.

4. Counsel has not spoken with AUSA Brent Venneman regarding this motion and will not have the opportunity to do so before Wednesday, September 14, 2011.

WHEREFORE, Defendant moves the Court for its order permitting him to file objections to the PSR on or before September 20, 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 12th day of September, 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 and emailed a copy to Missy Heilman, U.S. Probation and Parole Officer.

/s/ Phillip R. Gibson

*Counsel for Defendant*