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

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
V.	
STERLING BYNDOM,)
Defendant.)

Case No. 10-00162-18-CR-W-FJG

DEFENDANT STERLING BYNDOM'S MOTION TO AUTHORIZE MARRIAGE CEREMONY

Comes Now defendant, by and through his counsel, and moves the Court for an order authorizing a marriage ceremony between defendant and Glendora Freeman, his longtime girlfriend, to be performed at CCA Leavenworth. In support whereof, defendant states:

1. In May, 2010, defendant was charged in a conspiracy to distribute cocaine and cocaine base. He was released on bond, and remained compliant with the conditions of release.

2. On May 25, 2011, defendant entered a guilty plea pursuant to Plea Agreement, and surrendered into custody on that date. A presentence investigation report was ordered, which has not yet been completed, and there is no scheduled

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sentencing date. Defendant has been housed at CCA Leavenworth since being taken into custody.

3. Defendant and Glendora Freeman have been good friends since they were in their early teens, and have lived together for the past three years. Defendant has raised Ms. Freeman's two young children as his own.

4. Defendant requests this Court authorize a wedding ceremony so it can be approved by the United States Marshal and CCA Leavenworth.

WHEREFORE, defendant prays for an order of the Court authorizing a marriage ceremony to be performed at CCA Leavenworth.

Respectfully submitted,

/s/Ronald E. Partee Ronald E. Partee, MoBar No.23898 606 West 39th Street Kansas City, MO 64111 TEL: (816) 531-3500 FAX: (816) 753-3234 EMAIL: rpartee@pn-law.com Attorney for Defendant Sterling Byndom

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the following: Brent Venneman, Assistant United States Attorney.

/s/Ronald E. Partee Ronald E. Partee