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

UNITED STATES OF AMERICA,	)
Plaintiff,	)
	)
VS.	) Case No. 10-00162-21-CR-W-FJG
	)
DOROTHEA CAIN,	)
Defendant.	)

## MOTION FOR EXTENSION OF TIME IN WHICH TO SUBMIT OBJECTIONS TO PRELIMINARY PRESENTENCE INVESTIGATION REPORT

COMES NOW Defendant Dorothea Cain, by and through her counsel David H. Johnson, and moves the Court for it's Order granting one week additional time in which to file her Objections to the Preliminary Presentence Investigation Report. In support of her motion, Defendant states as follows:

- The Preliminary Presentence Investigation Report was released on October 20,
   2011.
- 2. Counsel for Defendant advises that he met with the Defendant, and reviewed the report with the Defendant, on Monday, October 31, 2011, but has not had time to complete the written Objections.
- 3. Objections were due on Thursday, November 3, 2011, and counsel will need additional time in which to complete the Objections, and to meet with Defendant to explain the Objections.
- 4. Counsel requests that the time in which to respond be extended to Monday November 14, 2012.

WHEREFORE, for good cause shown, Defendant prays the Court for leave to file his

2011.	r 14,
LAW OFFICES OF DAVID H. JOHN	isor
By: /s/ David H. Johnson  David H. Johnson - MO #23466  Livestock Exchange Building  1600 Genessee St. Suite 832	

(816) 531-5798 - Fax **ATTORNEY FOR DEFENDANT** 

Kansas City, Missouri 64102 (816) 531-7100 - Telephone

## **CERTIFICATE OF SERVICE**

I hereby certify that, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification to the attorneys for the Government and codefendants.

/s/ David H. Johnson David H. Johnson