

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

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
ANDREYA JONES, )  
)  
Defendant. )

No. 10-00162-17-CR-W-FJG

**DEFENDANT JONES' MOTION FOR AN EXTENSION OF TIME TO FILE  
OBJECTIONS TO THE PRELIMINARY PRESENTENCE INVESTIGATION REPORT**

COMES NOW defendant Andrey Jones, by and through her appointed counsel, Nick Seacord, and respectfully moves the Court for its Order granting a 14 day extension to file objections to the Preliminary Presentence Investigation Report. In report of her motion, Defendant states as follows:

1. The preliminary Presentence Investigation Report was completed on November 10, 2011.
2. Objections to said report are currently due on the 29<sup>th</sup> of November, 2011.
3. Defendant Jones is currently being held in St. Clair County, Missouri.
4. Due to previously scheduled obligations, Counsel was unable to meet with Defendant Jones until the 17<sup>th</sup> of November, 2011.
5. Counsel needs additional time to fully investigate Defendant Jones' questions and potential objections to the aforementioned report.
6. This request for an extension of time in which to file objections to the Preliminary Presentence Investigation Report is not intended for dilatory delay, but is sought in truth and fact that the defendant may be granted sufficient time to investigate the allegations made in the

Preliminary Presentence Investigation Report and to discuss and review any final objections with her court-appointed counsel.

WHEREFORE the defendant, Andrey Jones, respectfully moves this Court for an order extending the deadline in which she can file objections to the Presentence Investigation Report until the 13<sup>th</sup> day of December, 2011.

Respectfully Submitted,

/s/ Nick Seacord

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ATTORNEY FOR DEFENDANT

#### **CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2011, 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/ Nick Seacord