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

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UNITED STATES OF AMERICA, Plaintiff, v. GERALD D. WILLIAMS, Defendants.

Case No. 08-00297-14-CR-W-FJG

DEFENDANT GERALD D. WILLIAMS UNOPPOSED MOTION,

Defendant Gerald D. Williams, through counsel, hereby submits this motion to extend the date for filing his pre-trial motions to and including June 22, 2009.

TO EXTEND THE DATE FOR FILING PRE-TRIAL MOTIONS

In support of this motion, Defendant Williams states:

- 1. The existing date for pretrial motions is June 1, 2009.
- 2. There has been one previous extension of the pre-trial motions deadline.
- 3. Defendant Williams has pending before the Court a motion to replace counsel.
- 4. Counsel submits this motion to protect the rights of Defendant while Defendant's

motion to replace counsel remains pending.

5. The United States does not oppose this motion.

For these reasons, Defendant Gerald Williams, through counsel, requests that the date for

pre-trial motions be extended to June 22, 2009.

WA 1186221.1

Respectfully submitted,

SPENCER FANE BRITT & BROWNE LLP

s/ Mark A. Thornhill Mark A. Thornhill MO 26326 1000 Walnut Street, Suite 1400 Kansas City, Missouri 64106 Telephone: (816) 474-8100 Facsimile: (816) 474-3216 E-mail: mthornhill@spencerfane.com ATTORNEYS FOR DEFENDANT GERALD D. WILLIAMS

## **CERTIFICATE OF SERVICE**

I hereby certify the foregoing was filed electronically with the United States District Court for the Western District of Missouri this 1st day of June, 2009, with notice of case activity generated and sent electronically to:

Linda Parker Marshall United States Attorney's Office 400 E. 9th Street Kansas City, MO 64106 Telephone: (816) 426-3122 Facsimile: (816) 426-3126

A copy was served via e-mail and U.S. Mail, postage prepaid, upon:

Gerald D. Williams 109 N. Mathews Street Bunkie, LA 71322 geraldwilliams7000@yahoo.com

> s/ Mark A. Thornhill Attorney for Defendant Gerald D. Williams