

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT E. STEWART,

Defendant.

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Case No. 09-00296-03-CR-W-FJG

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

Comes Now defendant, by and through his counsel, and moves the Court for an order to extend the time in which he may file any objections to the preliminary presentence investigation report for two weeks, until April 9, 2010. In support whereof, defendant states:

1. On December 11, 2009, defendant entered a guilty plea to one-count Information, pursuant to a written plea agreement, and pursuant to Rule 11(c)(1)(C). A presentence report was ordered, and the preliminary report was prepared on March 12, 2010. Any objections to the preliminary report are due March 26, 2010. Sentencing has not been scheduled.

2. There are several matters in defendant's criminal history which need to be corrected, and counsel should receive the pertinent records from the State of Colorado within the next few days. Once received, counsel can make any appropriate objections within a matter of days. Although the plea agreement was for an agreed sentence, defendant PSR should nevertheless be as accurate as possible.

3. Local Rule 99.8.L provides for a modification of the time limits set forth in that Rule upon a showing of good cause. Defendant respectfully suggests he has good cause for such an

extension of time.

WHEREFORE, defendant prays for an order of the Court extending the time for any defense objections to the preliminary presentence investigation report to April 9, 2010.

Respectfully Submitted,

/s/Ronald E. Partee
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Attorney for Defendant Stewart

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the following: Jeffrey E. Valenti and Daniel M. Nelson, Assistant U.S. Attorneys, and all counsel of record, and a copy was sent via facsimile to:

Sylvia A. Gruenbacher
Senior U.S. Probation Officer
400 East 9th Street, Suite 4510
Kansas City, MO 64106
FAX (816) 512-1313

/s/Ronald E. Partee