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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.09-00157-04-CR-W-SOW
	)	
TIMOTHY JAY GREATHOUSE,	)	
	)	
Defendant.	)	

MOTION FOR CONTINUANCE

COMES NOW Defendant, Timothy Jay Greathouse, by and through his attorney, Daniel J. Ross, and respectfully moves the court to continue the above-captioned cause of action on the following grounds:

1.   This case is scheduled for trial on December 7, 2009 at 8:30 a.m.

2.   That counsel for defendant is scheduled for jury trial the week of November 30, 2009 in the Sixteenth Judicial Circuit, Division 17, *State of Missouri vs. Dale L. Thomas,* Case No.: 0816-CR06075-01, where the Defendant is charged with Involuntary Manslaughter in the First Degree, being charged on November 21, 2008.

3.   That due to undersigned counsel's busy trial schedule over the last 3 months he is in need of additional time to review the discovery materials, conduct relevant legal research, meet with defendant and adequately prepare for trial in this matter.

4.   That the Defendant has been consulted regarding this continuance and does not object to a continuance of this matter.

5.   This application for continuance is made in good faith on the grounds

stated and not to vex or harass the Court or the United States.

WHEREFORE, Defendant, Timothy Jay Greathouse, respectfully requests that

the Court continue this cause from its present trial date and re-set this cause for the April

2010 trial docket and for such other and further relief as the Court deems just and proper

in the premises.

Respectfully submitted,

DANIEL ROSS, LLC

By_____*/s/ Daniel J. Ross*_____
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was filed via the CM/ECF
system this 17th day of November 2009 and was simultaneously sent to The United States
Attorney's Office.

*/s/ Daniel J. Ross*____
Attorney for Defendant