

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08-00026-03-CR-W-FJG
)	
TROY R. SOLOMON,)	
)	
Defendant.)	

**GOVERNMENT’S MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DEFENDANT SOLOMON’S
MOTION FOR JUDGMENT OF ACQUITTAL, OR
IN THE ALTERNATIVE MOTION FOR NEW TRIAL**

The plaintiff, the United States of America, appears by Beth Phillips, United States Attorney, and Rudolph R. Rhodes, IV, Assistant United States Attorney, both for the Western District of Missouri, and requests a 22-day extension of time in which to file the government’s response to defendant Troy Solomon’s motion for judgment of acquittal, or in the alternative, motion for new trial (Doc. 365). The government offers the following suggestions in support of this request:

1. Defendant Troy R. Solomon filed a motion for judgment of acquittal, or in the alternative, motion for new trial (Doc. 365) on August 16, 2010;
2. The government's responses to defendant Elder’s motions are due to be filed with this Court on September 2, 2010. The government is requesting a 22-day extension, up to and including September 24, 2010, in which to file its response;
3. No previous extensions have been requested and/or granted;
4. Defense counsel does not object to this motion for an extension of time;

5. The undersigned counsel for the government needs an extension of time in which to prepare its response because the undersigned counsel has to file a response to co-defendant Christopher Elder's motion for a new trial (No. 369); because the undersigned counsel had to prepare and file appellate briefs in *United States v. John D. Berry*, No. 10-2018, and *United States v. Joshua P. Randolph*, No. 10-1907; because the undersigned counsel has to prepare for trial in *United States v. Christopher Heizman*, No. 08-00328-01-CR-W-DKG; and because to properly respond to the defendant Solomon's motion, the government requires additional time to conduct sufficient research and prepare an adequate response in this matter.

WHEREFORE, the government respectfully requests that this Honorable Court enter its Order permitting the government an additional twenty-two (22) days in which to file the government's response.

Respectfully submitted,

Beth Phillips
United States Attorney

By /s/ *Rudolph R. Rhodes, IV*

Rudolph R. Rhodes, IV, #39310
Assistant United States Attorney

Charles Evans Whittaker Courthouse
400 East 9th Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-4278

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on September 2, 2010, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

Chip B. Lewis
2120 Welch Street
Houston, Texas 77019

/s/ Rudolph R. Rhodes, IV

Rudolph R. Rhodes, IV
Assistant United States Attorney