

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

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:24-cr-00029-BP
	)	
	)	
ROXANNE NAZIR	)	
	)	
Defendant.	)	

**DEFENDANT’S UNOPPOSED MOTION
TO RESCHEDULE THE ARRAIGNMENT**

COMES NOW undersigned counsel, Matthew T. Merryman, on behalf of the Defendant Roxanne Nazir (“Defendant”), and requests this Court to reschedule the Arraignment scheduled on March 7, 2024 at 1:30 PM.

SUGGESTIONS IN SUPPORT

1. On February 6, 2024, Roxanne Nazir was named along with ten co-defendants in a thirteen count Indictment alleging conspiracy to commit wire fraud.
2. On February 26, 2024, the Court ordered Ms. Nazir to appear at her arraignment of the Indictment on March 7, 2024 at 1:30 PM.
3. On February 27, 2024, Counsel was ordered to represent Ms. Nazir pursuant to the Criminal Justice Act.
4. Counsel has discovered a scheduling conflict that exists on March 7, 2024 which will prevent counsel from appearing at 1:30 PM.

5. Counsel is scheduled to appear at a Termination of Parental Rights (“TPR”) hearing on March 7, 2024 at 2:00 PM before the Honorable Alisha O’Hara in Division III of the Clay County Circuit Court in In Re Anderson 23CY-JU00115.

6. Counsel does not believe he can make both the TPR hearing and Ms. Nazir’s arraignment.

7. Counsel is requesting that the arraignment be rescheduled for Wednesday March 6, 2024 or Friday March 8, 2024.

8. On March 4, 2024, Counsel conferred with AUSA Paul Becker and the United States of America does not oppose this request for a continuance.

9. This Unopposed Motion to Reschedule the Arraignment is made in good faith and not to burden or unduly delay the Court or United States of America.

WHEREFORE, Counsel for Defendant respectfully requests that this Court reschedule the arraignment to Wednesday March 6, 2024 or Friday March 8, 2024..

Dated: March 4, 2024

THE BATES & MERRYMAN LAW FIRM LLC

/s/ Matthew T. Merryman

Matthew T. Merryman

The Bates & Merryman Law Firm LLC

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2024, a copy of the foregoing Defendant's Unopposed Motion to Reschedule the Arraignment, was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's Electronic Case Filing System.

/s/Matthew T. Merryman

Matthew T. Merryman