

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 24-CR-00029-01-BP
	)	
DAISHA SANDERS,	)	
	)	
Defendant.	)	

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL SETTING

Defendant, Daisha Sanders, by and through counsel, Katrina Y. Robertson, requests this Court continue the July 8, 2024 trial setting to the February 2025 docket or alternatively the January 2025 docket. In support, Defendant states:

1. On February 6, 2024, a grand jury returned a multi-count indictment against Daisha Sanders along with ten co-defendants. Ms. Sanders is charged with thirteen counts and a forfeiture allegation.

2. Following her arraignment on February 29, 2024, this Court ordered trial set for April 29, 2024. Counsel for Ms. Sanders made an oral motion for a continuance and this case was set on the July 8, 2024 trial docket. At the hearing, each of the parties consented.

3. On February 29, 2024, the Government provided initial discovery.

4. Ms. Sanders resides and works out of state. In February 2024, Ms. Sanders obtained a new job and she had not earned time off. Within the last few weeks, Ms. Sanders has secured new employment and anticipates that she will be able to take time off and travel to meet with counsel next month.

5. Counsel needs additional time to continue their discussion about this case and have an in-person meetings for discovery review. A continuance will allow counsel and

her client time to review this case and determine a resolution.

6. Ms. Sanders is currently on pre-trial release and continues to abide by all conditions set by this Court.

7. Defense counsel has talked with her client regarding this request as well as the timetable for case resolution. Counsel has discussed the requirements of 18 U.S.C. § 3161 and her right to a speedy trial. Ms. Sanders agrees and believes that her best interests will be served by continuing the trial setting. Accordingly, the parties are requesting pursuant to 18 U.S.C. § 3161(h)(7)(A), the jury trial be continued.

8. Defense counsel has consulted with Assistant United States Attorney Paul Becker and he does not object to the request for a continuance. He indicated that the January 2025 trial setting seems long but did not suggest another trial setting.

9. The undersigned counsel has consulted with defense counsel for each of her co-defendants. The following parties join in this motion and consent to the request:

Attorneys	Defendants
Jeff Gedbaw	Joel Wright (2)
Paul Hood	Denise Sanders (3)
David Kelly	Rashonda Golden (4)
Matthey Merryman	Roxanne Nazir (5)
Bob Kuchar	Kiandra Crowe (6)
P.J. O'Connor	Anthony Chilis (7)
Al White	Shaquille Fielder (8)
Anthony Bologna	Alfred Hayes (9)
John Picerno	John Nichols (11)

10. Attorney Matthew Merryman for Roxanne Nazir (5) requests the February 2025 docket due to scheduling. The undersigned along with attorney John Picerno specifically request a setting not earlier than January 2025.

11. Attorney Ed Williams advises that his client Luana McNurlin (10) is scheduled for a change of plea.

For the reasons cited above, Ms. Sanders requests this motion be granted.

Respectfully submitted,

KATRINA Y. ROBERTSON, LLC

/s/ Katrina Y. Robertson
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CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of June 2024, I electronically filed the foregoing Motion with the Clerk of Court by using the CM/ECF filing System, which sent notification of such filing to all attorneys of record.

/s/ Katrina Y. Robertson
Katrina Y. Robertson MBN 61289