

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:24-cr-00029-BP-2
	)	
JOEL WRIGHT,	)	
	)	
Defendant,	)	

**MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO PRE-SENTENCE
REPORT**

COMES NOW Jeffrey Gedbaw, attorney for the Defendant, and requests that this Court grant the Defendant an extension of time in which to file his objections to the initial pre-sentence report that has been prepared in this case. In support of this request, the Defendant states the following:

1. On August 22, 2024, the Defendant appeared before this Court and entered a plea of guilty to the offense of Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349. The Court accepted the Defendant's plea and ordered a pre-sentence report.
2. The initial pre-sentence report was prepared by the United States Probation Office, and copies of the initial report were transmitted to all parties on October 25, 2024. Objections to said report are due on today's date, November 8, 2024.
3. The initial presentence report that was disseminated to counsel applied an enhancement that was different than that which was agreed upon as part of the written plea agreement between the Government and the Defendant. As a result, the guideline calculation is higher than was anticipated. Counsel needs additional time to conduct legal research on the basis for which the United State Probation Office determined that the agreed upon level of

enhancements were not appropriate. Counsel intends to object to the calculation of the Probation Office, as the defense feels that the base offense level and enhancements that were agreed upon in the written plea agreement were correct, and should be adopted.

4. There have been no previous requests by counsel to extend deadlines for the filing of objections to the PSR.

5. Counsel requests that this Court extend the deadline to file objections to the pre-sentence report to November 22, 2024. This will give counsel adequate opportunity to review the report with his client, and to prepare any necessary objections to the initial report.

6. Counsel would note that this matter is set for sentencing on December 18, 2024. If the Court were to grant this request for an extension by the defense, the Probation Office would still have adequate time to address the defense objections and file the final presentence report in time for the sentencing hearing.

WHEREFORE, for the reasons set forth above, it is requested that this Court enter an order extending the deadline to file objections to the pre-sentence report from the current deadline of November 8, 2024; and that the Court grant counsel an extension until November 22, 2024, to file any necessary objections.

Respectfully submitted,

/s/ Jeffrey Gedbaw

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 8, 2024, a true copy of the foregoing was served on all parties by electronic filing through the ECF system.

/s/ Jeffrey Gedbaw

Jeffrey Gedbaw