

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
)	
vs.)	No. 04 CR 702
)	Honorable Sam Der-Yeghiayan
)	
JUANITA NELSON,)	
Defendant.)	

**DEFENDANT NELSON'S AGREED MOTION FOR EXTENSION OF TIME TO FILE
OBJECTIONS AND MOTIONS DIRECTED TO PSR**

Now comes Defendant Juanita Nelson, by her attorney, Linda Amdur, and moves for extension of time to file objections and motions directed to Presentence Investigation Report (PSR). In support of this Motion for extension of time, the following is offered:

1. On October 5, 2005, Defendant Juanita Nelson entered a plea of guilty to Count One of the above-captioned indictment.
2. This Court set sentencing for January 10, 2006, and gave parties until January 3, 2006, to file any objections or motions directed toward the Presentence Investigation Report (PSR).
3. Counsel for Defendant Nelson will be unavailable during the last two weeks of December 2005 and will not return to Chicago until January 4, 2006.
4. The Presentence Investigation Report will not be prepared until the last week of December 2005. Thus, counsel cannot view the report until January 4, 2006.

5. Counsel seeks the date of January 6, 2006, for filing any objections and motions directed toward the PSR.

6. AUSA Pravin Rao has no objection to the filing of Defendant Nelson's objections and motions on January 6, 2006.

Wherefore, Defendant Juanita Nelson moves for extension of time to file any objections and motions directed toward the Presentence Investigation Report to the date of January 6, 2006.

Respectfully submitted,

S/Linda Amdur
Linda Amdur, Attorney for
Defendant Juanita Nelson

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