

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:21-cr-00201
)	
MICHAEL AARON QUICK,)	
STEPHEN BRIAN QUICK,)	
ZACHARY HAYES MARTIN,)	
)	
Defendant.)	

**MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO PRESENTENCE
INVESTIGATION REPORT**

COMES NOW Defendants by and through Counsel, Joseph S. Passanise and Taylon Sumners of the WAMPLER AND PASSANISE LAW OFFICE and moves this Court for an extension of time to file objections to the Presentence Investigation Reports due on February 24, 2022 in accordance with the Legal Suggestions attached hereto:

LEGAL SUGGESTIONS

1. Defendants have been charged with crimes that could carry an extensive sentence.
2. Counsel has not had the opportunity to meet and confer with all Defendants and respectfully requests additional time to respond to the Presentence Investigation Reports. Counsel expects to be able to conduct a conference with his clients within the next week.
3. This cause is currently set for Sentencing on March 17, 2022.
4. That Counsel requests an extension of time for one week to adequately respond to the Presentence Investigation Reports.

WHEREFORE, Counsel prays for an Order of this Court extending the time for objections to the Presentence Investigation Report to March 5, 2022, and for such other and further relief as the Court deems just and proper.

Respectfully Submitted

/s/Joseph Passanise
JOSEPH S. PASSANISE, MO Bar #46119
TAYLON SUMNERS, MO Bar #73114
Attorneys for Defendant

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Certificate of Service

I hereby certify that on February 23, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to U.S. Attorney, Springfield, Missouri.

/s/Joseph Passanise
Joseph S. Passanise
Taylon Sumners
Attorneys at Law