

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KEVIN MARSH,

Defendant.

CASE NO. 3:20-cr-00727

**DEFENDANT MARSH'S MOTION FOR AN EXTENSION OF TIME TO FILE  
OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT**

Defendant Kevin Marsh, by and through his counsel, respectfully moves the Court for an Order granting a 21-day extension to file objections to the Presentence Investigation Report. In support of his motion, Defendant states as follows:

1. On February 24, 2021, Kevin Marsh appeared before this Court and entered a guilty plea to Count 1 of the Information.

2. The Presentence Investigation Report was completed on May 21, 2021. A copy of the Presentence Investigation Report was provided to counsel on the same day.

3. On June 4, 2021, Kevin Marsh moved the Court for an Order granting an extension of time to file objections to the Presentence Investigation Report, due to Mr. Marsh's authorized travel and in order to give counsel additional time to carefully review the Report with Mr. Marsh. [ECF No. 36] The U.S. Attorney's Office for the District of South Carolina did not object to Mr. Marsh's motion.

4. On June 7, 2021, the Court entered an Order granting Mr. Marsh's June 4 motion. [ECF No. 37]

5. On June 25, 2021, Mr. Marsh moved the Court for an Order granting a further extension of time to file objections to the Presentence Investigation Report, due to the complicated factual and legal issues described in the Report. [ECF No. 38]

6. On the same day, the Court entered an Order granting Mr. Marsh's June 25 motion, and setting a new deadline of July 12, 2021, to file objections to the Presentence Investigation Report. [ECF No. 39]

7. Due to the need to continue to confer with the U.S. Probation Office and the U.S. Attorney's Office for the District of South Carolina regarding the complicated factual and legal issues described in the Presentence Investigation Report, and because the schedules of Counsel and the U.S. Probation Office are incompatible for a meeting before the July 12 deadline, Counsel requests additional time to file objections to the Report.

8. Counsel has contacted Caleb Gulledge, the U.S. Probation Officer assigned to this case, who indicated that he has no objection to extending the deadline for objections to the Presentence Investigative Report.

9. Counsel has also contacted the U.S. Attorney's Office for the District of South Carolina, and the Assistant United States Attorneys assigned to the case have indicated that they have no objections to extending the deadline for objections to the Presentence Investigative Report.

10. This request for an extension of time in which to file objections to the Presentence Investigation Report is not intended for dilatory delay, but is sought in truth and fact that the Defendant may be granted sufficient time to investigate the allegations made in the Presentence Investigation Report, to discuss and review any objections with Counsel, and for Counsel to confer with the U.S. Probation Office and the U.S. Attorney's Office for the District of South Carolina regarding the REport.

WHEREFORE the Defendant, Kevin Marsh, respectfully moves this Court for an order extending the deadline in which he can file objections to the Presentence Investigation Report until August 2, 2021.

Dated: JULY 8, 2021

Respectfully submitted,

LAW OFFICES OF J. BRADY HAIR

/s/ Derk Van Raalte

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**Certificate of Service**

I HEREBY CERTIFY that on this 8th day of July, 2021, I caused the foregoing document to be electronically filed with the Clerk of Court using CM/ECF, and that such filing provided electronic notice to all counsel of record.

JULY 8, 2021

/s/ Derk Van Raalte

Derk Van Raalte