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GREENVILLE, S.C.

**IN THE DISTRICT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA**

GREENVILLE DIVISION

UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

Defendant.

CASE NO. 6:13-cr-00170-JMC-1

**PETITION FOR ENTRY OF
AMENDMENT TO PLEA AGREEMENT
OR EXTENSION OF TIME
[filed concurrently with DECLARATION
IN SUPPORT OF PETITION FOR
ENTRY OF AMENDMENT TO PLEA
AGREEMENT OR EXTENSION OF
TIME]**

COMES NOW the Defendant, GORDON L HALL, to respectfully petition this Court to accept an amendment to the Plea Agreement of February 7, 2014, in this instant Case in accordance with the provisions of ECF #192, Federal Rules of Criminal Procedure Rule 11(c)(1)(a), and Federal Rules of Criminal Procedure Rule 11(c)(1)(c) as a sentence appropriate for the disposition of this Case or in the alternative an extension of time for the Government to have proper amount of time to challenge the E-Mail of February 16, 2014 requesting the Governments position with respect to the intent of filing this Petition to amend the Plea Agreement of February 7, 2014 to reflect the Defendants understanding of the agreement between the parties, a copy of which is attached hereto and incorporated herein as "Exhibit A." This Petition is not meant for harassment nor delay and is made in good faith in the interests of justice.

In the event that this Court does not grant this Petition at this time and an extension of time is given; may it please the Court that the Defendant sent an E-Mail to the attorney for the

Government William J. Watkins, Jr. at the E-Mail address provided by him in the appearance docket regarding his position to this on February 16, 2014, however, no response has been given as of the date of this filing.

CONCLUSION

WHEREFORE, the Defendant prays that the Court:

- A) Accept the amendment to the plea agreement by incorporating the provisions of ECF #192 as a sentence that is a proper disposition of this case; and
- B) Grant such other and further relief as is just and proper.

Respectfully submitted this 18th day of February 2014.

GORDON L HALL

