

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA	*	CASE NO. 5:15CR446
Plaintiff	*	
-vs-	*	JUDGE DAN A. POLSTER
TERRENCE JOSEPH McNEIL	*	<u>MOTION FOR PRE-PLEA</u>
Defendant	*	<u>PRESENTENCE REPORT FOR</u>
		<u>GUIDELINE CALCULATION ONLY</u>
		<u>EXCLUDING CRIMINAL HISTORY</u>
	* * *	

Now comes the Defendant, TERRENCE JOSEPH McNEIL, by and through counsel, and respectfully moves this Court for an order directing preparation of a Pre-Plea Presentence Report for the limited purpose of determining this Defendant's guideline calculation excluding criminal history. In support hereof, Defendant McNeil represents that the purpose of the report would be to confirm that the parties have properly calculated the guideline calculations. Preparation of the requested report would assist Defendant and counsel in this matter. Counsel has spoken with the AUSA handling this case and he has no objection to the request herein.

WHEREFORE, Defendant McNeil respectfully requests an order directing preparation of a Pre-Plea Presentence Report for purposes of determining Defendant McNeil's potential guideline calculation excluding criminal history; and for such other and further relief as this Court shall deem just.

Respectfully submitted,

/S/ NATHAN A. RAY
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PROOF OF SERVICE

I hereby certify that on February 25, 2016, a copy of the foregoing Motion for Pre-Plea Presentence Report for Guideline Calculation Only Excluding Criminal History was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/S/ NATHAN A. RAY

NATHAN A. RAY

Attorney for Defendant