

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 15-CR-00240 01/02
	*	
VERSUS	*	DISTRICT JUDGE HICKS
	*	
MICHAEL A. LORD AND		
RANDALL B. LORD	*	MAGISTRATE JUDGE HORNSBY

MOTION TO EXTEND SURRENDER DATE

NOW INTO COURT, through undersigned counsel, comes the defendant, **RANDALL B. LORD**, who respectfully prays that his August 10, 2017 surrender date be extended to November 10, 2017 for the following reasons:

1. The above defendant has been ordered to surrender on August 10, 2017, in the above referenced matter.
2. The defendant was indicted in the case on November 18, 2015 and on November 20, 2015 the Government placed liens (Lis Pendens) against all of his immovable property. One of the properties is an office building containing tenants. The defendant needs to sell the building to help pay day to day expenses and he submits that his wife, Lisa, is incapable of handling that property.
3. Mr. Lord is unable to sell the building or even borrow against it as long as the liens are not removed from the clerk's records.
4. After the defendant's guilty plea and sentence, the Government moved to forfeit the property. However, after a hearing, your honor denied the Government's motion for forfeiture. The ruling was signed by the court on July 7, 2017, but the Government has not cancelled the liens.

5. As a result of the liens against the property, the defendant needs additional time to take care of the sale of his building. Defendant also prays for the court to order the removal of the liens.

WHEREFORE, the defendant, **RANDALL B. LORD**, prays that his surrender date be extended to November 10, 2017, to have time to sell the building mentioned herein so it will not be a burden for Lisa Lord after he is incarcerated.

Respectfully submitted,

STROUD, CARMOUCHE & BUCKLE, PLLC

BY: /s/ Paul J. Carmouche

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**ATTORNEYS FOR DEFENDANT,
RANDALL B. LORD**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing has been sent to Assistant U.S. Attorney Cytheria Jernigan by operation of the Court's electronic filing system.

Signed in Shreveport, Louisiana, on this 1st day of August 2017.

/s/ Paul J. Carmouche
OF COUNSEL