

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

|                           |   |                           |
|---------------------------|---|---------------------------|
| UNITED STATES OF AMERICA, | ) |                           |
|                           | ) |                           |
| Plaintiff,                | ) |                           |
|                           | ) |                           |
| -vs-                      | ) | Case No.: 21-cr-00239-GKF |
|                           | ) |                           |
| ALETA NECOLE THOMAS,      | ) |                           |
| PEPPER JONES,             | ) |                           |
| KATRINA WEST,             | ) |                           |
|                           | ) |                           |
| Defendants.               | ) |                           |

JOINT MOTION TO CONTINUE DEADLINES AND NEW SCHEDULING ORDER

COME NOW all parties to this action, by and through counsel of record, and respectfully move this Court to continue all remaining court dates and deadlines currently set, upon the following grounds, to-wit:

1. Counsel for the Government, Kristin F. Harrington, joins this request for a continuance and entry of a new scheduling order.

2. Defense counsel who join in this request and are requesting a continuance of all dates for a period of ninety (90) days are as follows:

Keith A. Ward for Defendant Aleta Thomas (1)

Stephen G. Layman for Defendant Pepper Jones (2)

G. Steven Stidham for Defendant Katrina West (3)

3. The original Indictment in this matter was filed on May 20, 2021, charging only Ms. Thomas in the Indictment (Dkt. #2).

4. On July 20, 2021, the Government presented a Superseding Indictment as to Defendants

Thomas (1), Jones (2), and West (3).

5. On July 28, 2021, the court entered and amended Scheduling Order requiring Motions to be due by August 11, 2021, Responses by August 25, 2021, Pretrial Conference set for September 8, 2021, Jury Instructions, Voir Dire, and Trial Briefs due September 13, 2021; and the Jury Trial to be set September 20, 2021 (Dkt. #38).

6. Counsel listed above are respectfully requesting the Court enter a new Scheduling Order.

7. The Government's discovery is voluminous. The discovery contains approximately 10 gigabits of information. In total, the Government's production contains thousands of individual items that must be reviewed.

8. The moving parties submit that continuing the trial of this case to the Court's December 2021 trial docket would allow them reasonable time necessary for effective trial preparation with regard to the discovery materials that have been produced to date. Such also allows reasonable time for continued plea negotiations. Therefore, the ends of justice would be served by moving the trial date and all related dates of this case to the Court's December 2021 docket.

9. Defendants joining in this Motion for Continuance intend to file waivers of speedy trial forthwith.

WHEREFORE, premises considered, the moving Defendants herein ask the Court to find that continuing the trial of this matter from September 20, 2021 to December 2021 serves the best interests of justice by affording them reasonable time for effective preparation, that the period of time occasioned by such continuance outweighs the interest of the public in a speedy trial, and that the dates between September 20, 2021, and December 13, 2021, are therefore excluded from computation under the Speedy Trial Act, 18 U.S.C. §3161.

Respectfully submitted,

/s/ Stephen G. Layman

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COUNSEL OF RECORD FOR DEFENDANT

PEPPER JONES

CERTIFICATE OF SERVICE

I certify that on the 31<sup>st</sup> day of August, 2021, a true-and-correct copy of the foregoing was served upon:

All Counsel of Record

By electronic transmission to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrant(s) above.

s/ Stephen G. Layman