

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA
TULSA DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	4:21-CR-00239-GKF-1
	)	
ALETA NECOLE THOMAS	)	

MOTION FOR EXTENSION OF TIME

Ms. ALETA NECOLE THOMAS, by and through her attorney, Mr. MURDOCH WALKER, II, ESQ., respectfully moves this Court to grant an extension of no less than seven (7) days to file a response to the Government's Motion for an Order Recognizing that Defendant has waived her Attorney-Client Privilege. Motion ECF No. 150.

I. Relevant Procedural History

On September 13, 2022 the Government filed a Motion for an Order Recognizing that Defendant has waived her Attorney-Client Privilege. Motion ECF No. 150

On September 13, 2022 this Court entered an order for undersigned counsel to file a response to the Motion for an Order Recognizing that Defendant has waived her Attorney-Client Privilege by September 20, 2022. Order, ECF No.151

II. Factual Assertions

Undersigned counsel has attempted to contact Ms. Thomas to discuss the Court's order and to discuss a response to the Government's motion, since the Government requested Ms. Thomas' position by email, on August 31, 2022.

Ms. Thomas is currently being housed at the Federal Medical Center, Carswell located in Fort Worth, Texas.

Furthermore, and since Thursday, September 15, 2022, specifically, and each day thereafter, the undersigned counsel has repeatedly contacted the Federal Medical Center, Carswell, to schedule a legal phone call to speak with Ms. Thomas. Counsel has left repeated messages with staff members at the Federal Medical Center, Carswell stressing the urgency to speak with Ms. Thomas. No calls or responses have been received from the Federal Medical Center, Carswell facility to date.

III. Memorandum of Law

Ms. Thomas respectfully submits that good cause exists for this Court to extend its deadline for a response to Government's motion. For reasons, as demonstrated herein above, Ms. Thomas respectfully requests that the Court ordered response to the Government's Motion for an Order Recognizing that Defendant has waived her Attorney-Client Privilege be extended seven (7) days.

IV. Opposing Party's Position

The Government does not oppose this motion.

V. Conclusion

Ms. Thomas, based on the foregoing assertions and argument, prays that this Court continue the response deadline for no less than seven (7) days.

Date: September 20, 2022

Respectfully submitted,

s/Murdoch Walker, II, Esq.

Murdoch Walker, II, Esq.

Ga. Bar # 163417

mwalker@lowtherwalker.com

Lowther | Walker LLC

101 Marietta St., NW, Ste. 3325

Atlanta, GA 30303

O 404.496.4052

www.lowtherwalker.com

Attorney for Aleta Necole Thomas

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA
TULSA DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	4:21-CR-00239-GKF-1
	)	
ALETA NECOLE THOMAS	)	

CERTIFICATE OF SERVICE

I certify that on September 20, 2022, I electronically filed the foregoing MOTION FOR EXTENSION OF TIME with the Clerk of the United States District Court for the Northern District of Oklahoma by way of the CM/ECF system, which automatically will serve this document on the attorneys of record for the parties in this case by electronic mail.

Date: September 20, 2022

Respectfully submitted,

s/Murdoch Walker, II, Esq.

Murdoch Walker, II, Esq.

Ga. Bar # 163417

mwalker@lowtherwalker.com

Lowther | Walker LLC

101 Marietta St., NW, Ste. 3325

Atlanta, GA 30303

O 404.496.4052

www.lowtherwalker.com

Attorney for Aleta Necole Thomas