IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA v. MEGHAN THOMAS, JESIKA BLAKELY, TELDRIN FOSTER AMANDA CHRISTIAN, DWAN ASHONG, A/K/A DWAN GILPIN, JOHN GAINES, A/K/A MARTY GAINES, JERRY BAPTISTE, CARLA JACKSON, DEREK PARKER, RYAN WHITTLEY, AND RICK McDUFFIE	Criminal Action No. 1:20-CR-296-JPB-CMS

UNOPPOSED JOINT MOTION TO CONTINUE PRETRIAL MOTION DEADLINE AND PRETRIAL CONFERENCE

Defendants Meghan Thomas, Jesika Blakely, Teldrin Foster, Amanda Christian, Dwan Ashong, a/k/a Dwan Gilpin, John Gaines, a/k/a Marty Gaines, Jerry Baptiste, Carla Jackson, Derek Parker, Ryan Whittley, and Rick McDuffie, by and through undersigned counsel, (collectively "Defendants") respectfully file this Unopposed Joint Motion to Continue the Pretrial Motion Deadline and the Pretrial Conference currently scheduled for January 17 and 19, 2022, respectively, for a period of 60 days, showing the Court as follows:

1. With the exception of Defendant Foster, a grand jury sitting in the Northern District of Georgia returned the above-referenced indictment against Defendants in July 2021 (Doc. 135). The grand jury superseded such indictment to add Defendant Foster on August 10, 2021 (Doc. 290). None of the Defendants are in custody. The Second Superseding Indictment alleges multiple fraud and money laundering schemes involving over a dozen allegedly fraudulent CARES Act Paycheck Protection Program loan applications submitted to various lenders by different businesses (*Id*.).

2. Counsel for the Defendants, with two exceptions, were appointed by the Court in this case pursuant to the Criminal Justice Act of 1964, 18 U.S.C. § 3006A (Doc. 246).

3. Counsel for the Defendants have received the government's initial discovery production, which is voluminous (in excess of 50GB and approximately 200,000 digital files) and have been reviewing such voluminous discovery. Such discovery includes multiple email accounts, bank accounts, loan files, and recorded interviews, among other matters.

4. The court-ordered deadline for the filing of pretrial motions is January 17, 2022, and the pretrial conference is scheduled for January 19, 2022 (Doc. 389).

5. Defendants respectfully request that the Court continue the pretrial conference and pretrial motion deadline for 60 days to afford counsel for

Defendants additional time to continue to review and analyze the discovery, continue to confer with the prosecutors, assess any necessary pretrial motions, evaluate potential pretrial resolutions, and continue to confer with and advise their clients.

6. Defendants further request that any delay caused by the requested extension be excluded from Speedy Trial Act computations because there is good cause for the extension, a continuance is needed to allow reasonable time necessary for effective representation to prevent a miscarriage of justice, and the ends of justice in granting the extension outweigh the public's and the defendant's interests in a speedy trial. See 18 U.S.C. §§ 3161(h)(7)(A), 3161(h)(7)(B)(i)&(iv).

7. Only one prior continuance has been requested or obtained.

8. Counsel has conferred with counsel for the government regarding the requested 60-day continuance, and the government has stated that it does not oppose this request.

WHEREFORE, Defendants respectfully requests that Court extend the pretrial motion deadline in this case for sixty (60) days, to March 14, 2022, and reschedule the pretrial conference for some date thereafter that is agreeable to the Court and the parties.

Respectfully submitted, this 13th day of January, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record, including:

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This 13th day of January, 2022.

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