

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

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL ACTION
	)	NO. 1:20-CR-296-JPB-AJB
ANDRE LEE GAINES	)	
_____	)	

MOTION TO CONTINUE PRETRIAL CONFERENCE

COMES NOW, Defendant, ANDRE LEE GAINES, by and through undersigned counsel and files this motion to continue the pretrial conference currently scheduled for May 10, 2021. For cause, Defendant shows the following:

1) Defendant has been charged in an indictment with conspiracy, bank fraud, wire fraud, and money laundering. He entered a not guilty plea. A pretrial conference is scheduled for May 10, 2021.

2) Undersigned counsel has another hearing scheduled for the same time as the pretrial conference. In addition, the parties are discussing a possible resolution of the case. If the case can be resolved, the pretrial conference will be unnecessary. As a result, Defendant requests a two week continuance of the pretrial conference.

3) The period from the filing of this motion through the pretrial conference is properly excluded from the speedy trial clock because the ends of

justice served by the granting this extension of time outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A).

WHEREFORE, the defendant respectfully requests that the Court continue the pretrial conference for two weeks.

Dated: This 8th day of May, 2021.

Respectfully submitted,

S/BRIAN MENDELSON, Esq.
STATE BAR NO. 502031
ATTORNEY FOR ANDRE LEE GAINES

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2021, I electronically filed this pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Tal Chaiken, Esq.
Nathan Kitchens, Esq.
Assistant United States Attorney
600 Richard B. Russell Building
75 Spring Street, S. W.
Atlanta, Georgia 30335

Dated: This 8th day of May, 2021.

s/BRIAN MENDELSON, Esq.
ATTORNEY FOR ANDRE LEE GAINES
STATE BAR NO. 502031