

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO.: 1:20-CR-00296-JPB-AJB
	)	
BERN BENOIT,	)	
	)	
Defendant.	)	
_____	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME WITHIN WHICH TO
FILE PRETRIAL MOTIONS BRIEF IN SUPPORT THEREOF**

Defendant, (BERN BENOIT), by and through his undersigned counsel (ANTHONY O. EGBASE), hereby moves this Court for an order to continue the pretrial scheduling conference dated August 24, 2020. In support of this Motion, counsel avers as follows:

1.

Defendant was arraigned in this court on August 14, 2016 and plead not guilty to counts 7, 8, 9 and 13 through 16.

2.

Shortly before the arraignment, Defendant and counsel received voluminous discovery from the Government in this matter and Defendant and counsel are still in the process of reviewing such discovery. Defendant and his counsel need additional time to comply with the pretrial order.

3.

Undersigned counsel states herein that Defendant has expressly authorized the filing of this motion for an extension of time within which to file pretrial motions and to continue the pretrial conference and waives any speedy trial time restraints.

4

On August 24, 2020, Defendant's counsel conferred with Assistant United State Attorney (AUSA), Tal Cohen Chaiken regarding this motion and Ms. Chaiken indicated that the government will not oppose a 60-day continuance.

WHEREFORE defendant (BERN BENOIT) and his counsel hereby request that this court continue the scheduling conference in this matter for at least 60 days, or to a date the court deems proper.

Dated this 24TH day of August, 2020.

Respectfully submitted,

s/ Anthony O. Egbase

ANTHONY O. EGBASE

California Bar No. 181721

Attorney for Defendant Bern Benoit

A.O.E LAW & ASSOCIATES, INC

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CERTIFICATE OF COMPLIANCE

This is to certify that to the best of my knowledge this document has been prepared with one of the font and point selections approved by the Court in LR 5.1B, pursuant to LR 7. Specifically, the above-mentioned document has been prepared using Times New Roman font, 14 point.

Dated this 24TH day of August, 2020.

s/ Anthony O. Egbase
ANTHONY O. EGBASE
California Bar No. 181721
Attorney for Defendant Bern Benoit

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	)	
Defendant.	)	
_____	)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the above date, I electronically filed this document using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Respectfully submitted,

s/ Anthony O. Egbase
ANTHONY O. EGBASE
California Bar No. 181721
Attorney for Defendant Bern Benoit

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UNITED STATES OF AMERICA,)
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 Plaintiff,)
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 vs.)
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 BERN BENOIT,)
)
 Defendant.)
 _____)

CASE NO.: 1:20-CR-00296-JPB-AJB

ORDER

For good cause shown, the Defendant's Motion for Extension of Time to File Motions and to Continue the Pretrial Conference is hereby GRANTED, Defendant shall have until _____ to file motions. The pretrial conference shall be held on October _____, 2020 at _____.

The period from the date of this order to the date of the pretrial conference shall be excluded from the speedy trial clock because the ends of justice served by the granting this extension of the time outweigh the best interest of the public and the defendants in speedy trial. 18 U.S.C. Section 3161(h)(7)(A).

IT IS SO ORDERED

This _____ day of August, 2020.

HON. ALAN J. BAVERMAN
UNITED STATE MAGISTRATE JUDGE

Proposed Order submitted by:
Anthony O. Egbase
Attorney for Bern Benoit