

**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 TO CONTINUE
SENTENCING HEARING SCHEDULED FOR JUNE 23, 2021 AT
1:00 PM EST.**

Defendant, (BERN BENOIT), by and through his undersigned counsel (ANTHONY O. EGBASE) and the Government, hereby moves this Court to continue the sentencing hearing scheduled for June 23, 2021 at 1:00pm EST. In support of this Motion, counsel for the Defendant avers as follows:

1.

The government action alleges conspiracy between multiple defendants that reside in multiple jurisdictions.

2.

On March 11, 2021, Defendant BERN BENOIT, pled guilty to count seven of the Indictment pursuant to Rules 11(c)(1)(A) and (B) of the Fed. R. Crim. P. before the Honorable J.P. Boulee.

3.

On May 18, 2021, United States Probation officer, Maria Ridley, sent the Defendant Bern Benoit and Counsel the Initial Presentence Report on Defendant.

4.

On June 14, 2021, United States Probation officer, Maria Ridley, sent the Defendant Bern Benoit and Counsel the Final Presentence Investigation Report on Defendant.

5.

Following the Defendant's entry of guilty plea in this case, counsel for the Defendant was unavailable and had to travel out of the country, due to the passing of a family member.

6.

Although Defendant and counsel have worked diligently in the Defense of this case, Defendant and counsel need additional time to prepare Statement of Witnesses and Sentencing Memorandum in this matter.

7.

The government has indicated it has no objection in the granting of this Motion.

8.

Pursuant to the court's request, Defendant and counsel hereby file this Motion to Continue Defendant's Sentencing hearing scheduled for June 23, 2021 at 1:00pm Eastern Time, for an additional 30 days, to and including July 23, 2021.

Dated this 14TH day of June, 2021.

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 14TH day of June, 2021.

Respectfully submitted,

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

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

ORDER

For good cause shown, the Defendant's Unopposed Motion for Extension of Time to Continue Sentencing Hearing Scheduled for June 23, 2021 at 1:00pm EST, is hereby GRANTED. Defendant shall have until _____ to file a sentencing Memorandum. The Sentencing hearing shall be held on July _____, 2021 at _____.

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

IT IS SO ORDERED

This _____ day of June 14, 2021.

HON. J.P. BOULEE
UNITED STATES DISTRICT JUDGE

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

