

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

ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
vs.	)	CRIMINAL ACTION
	)	NO. 1:22-CR-171-MLB-RDC
<u>CARL DELANO TORJAGBO</u>	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL
MOTIONS AND TO CONTINUE PRETRIAL CONFERENCE**

COMES NOW the Defendant, CARL DELANO TORJAGBO, by and through his undersigned counsel, and moves the Court for sixty (60) additional days to file pre-trial motions. Mr. Torjagbo also requests that the pretrial conference, which is scheduled for May 26, 2022, be continued. In support of this motion, Mr. Torjagbo states the following.

Mr. Torjagbo is charged in a seven-count indictment. Count One charges bank fraud in violation of 18 U.S.C. §§ 1344 and 2. Counts Two through Four charge Concealment Money Laundering in violation of 18 U.S.C. 1956(a)(1)(B)(i) and 2. Count Five through Seven charge transactional money laundering in violation of 18 U.S.C. §§ 1957 and 2.

Mr. Torjagbo made his initial appearance and was arraigned on May 12, 2022. Thus, his pretrial motions are due to be filed by May 26, 2022. The discovery

materials produced thus far by the Government are voluminous. Undersigned counsel has not yet been able to complete a review of the discovery materials, consult with Mr. Torjagbo, and prepare pretrial motions. Given the volume and nature of the discovery materials and the press of undersigned counsel's responsibilities on other matters, Mr. Torjagbo requests an extension of sixty (60) days to complete a review of the discovery materials and to file pretrial motions. Mr. Torjagbo further requests that the pretrial conference be continued until a date after the extended pretrial motions filing deadline.

Undersigned counsel has spoken with counsel for the Government, Russell Phillips, regarding this motion for an extension of time to file pretrial motions. Mr. Phillips has informed undersigned that he does not object to this motion.

Undersigned counsel posits that the time associated with this requested extension of time and continuance is excludable under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161. Subsections 3161(h)(7)(A) and (h)(7)(B)(iv) authorize exclusion of delay based upon a finding that the ends of justice outweigh the best interests of the public and the defendant in a speedy trial, such as where the delay provides reasonable time necessary for effective preparation by counsel, taking into account the exercise of due diligence. See 18 U.S.C. §§ 3161(h)(7)(A) & (h)(7)(B)(iv).

WHEREFORE, Mr. Torjagbo respectfully requests that this motion be granted.

Dated: This 25th day of May, 2022.

Respectfully submitted,

s/ Kendal D. Silas

KENDAL D. SILAS

State Bar of Georgia No. 645959

Attorney for

CARL DELANO TORJAGBO

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Extension of Time to File Pretrial Motions and to Continue Pretrial Conference was electronically filed this day with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following:

Russell Phillips, Esq.
Assistant United States Attorney
Northern District of Georgia
Federal Courthouse, Ste. 600
75 Ted Turner Drive, S.W.
Atlanta, GA 30303

Dated: This 25th day of May, 2022.

s/ Kendal D. Silas

KENDAL D. SILAS, Esq.

Attorney for

CARL DELANO TORJAGBO