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

UNITED STATES OF AMERICA,	:	
	:	
	:	CRIMINAL INDICTMENT
v.	:	NO. 1:22-CR-171
	:	
CARL DELANO TORJAGBO,	:	
Defendant.	:	

MOTION FOR CONTINUANCE OF PRETRIAL CONFERENCE AND EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

Now comes the defendant, Carl Delano Torjagbo, by and through his undersigned counsel, who moves the court for an extension of time in which to file pretrial motions and for a continuance of the September 14, 2022 pretrial conference. In support thereof, the defendant shows the court the following:

1.

The discovery in this case is voluminous. The defendant has not had sufficient time to review the discovery or an opportunity to discuss its importance with his counsel.

2.

Mr. Torjagbo's initial concerns included an appeal of the detention order and claims over sized property. Those issues remain pending. Mr. Torjagbo and counsel

still must focus on their thorough review of the discovery and any potential pre-trial motions.

3.

Counsel has discussed the need for additional time with the government. There is no objection on its part to allowing the defendant an additional time to review discovery.

The government has advised counsel that a superseding indictment is being contemplated. A continuance to allow time for that issue to be resolved would promote judicial efficiency and economy.

Wherefore, the defendant, Carl Delano Torjagbo, requests that he be granted a continuance of the pretrial conference and an extension of time in which to file pretrial motions.

Respectfully submitted,

/s/ *Jay L. Strongwater*
Jay L. Strongwater
Georgia Bar No. 688750

/s/ *Emily B. Strongwater*
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true and correct copy of the within and foregoing pleading upon counsel for the government by electronically posting through the District Court's ECF Filing System, addressed as follows:

John Russell Phillips, Esq.
Assistant United States Attorney
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This 14th day of September, 2022.

/s/ *Jay L. Strongwater*
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