

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>	)	

**RESPONSE TO GOVERNMENT’S MOTION FOR INTERLOCUTORY
SALE OF REAL PROPERTY**

COMES NOW the Defendant, CARL DELANO TORJAGBO, by and through his undersigned counsel, and files this response to the Government’s motion for interlocutory sale of real property, doc. 61, and supplemental brief in support, doc. 95. Mr. Torjagbo opposes the sale of the listed properties.

Mr. Torjagbo does not accede to the Government’s assertions that the condition of the 5114 Greythorne Lane property is rapidly deteriorating or that the property is at risk of deterioration or decay. Additionally, there are no squatters on the property. The Cobb County Police Department has been authorized to arrest persons who are on the property without authorization.

The Government has filed with the Superior Court of Cobb County notices of *lis pendens* regarding forfeiture with respect to the 5114 Greythorne Lane property and the 101 Holt Drive property. (Docs. 16, 17). Those notices serve to limit the

prospect of any change in title as to those properties while this legal action is pending.

WHEREFORE, Mr. Torjagbo respectfully requests that the Government's motion for interlocutory sale of the listed properties be denied.

Dated: This 17th day of July, 2024.

Respectfully submitted,

s/ Kendal D. Silas

KENDAL D. SILAS

State Bar of Georgia No. 645959

Attorney for

CARL DELANO TORJAGBO

Federal Defender Program, Inc.
Suite 1500, Centennial Tower
101 Marietta Street, N.W.
Atlanta, GA 30303; 404/688-7530

