

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
CARL DELANO TORJAGBO	)	
_____	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSES TO MOTIONS IN LIMINE**

COMES NOW Defendant, CARL DELANO TORJAGBO, by and through undersigned counsel, and moves this Court to extend by two (2) weeks the deadline for filing responses to the parties' respective motions in limine. In support thereof, Mr. Torjagbo states the following.

In the Court's Order Setting Trial, doc. 138, the Court directed that the parties file motions in limine by January 28, 2025, file responses to the motions in limine by February 11, 2025, and file any replies to the responses by February 25, 2025. A pretrial conference is scheduled for March 18, 2025. Trial is scheduled for April 28, 2025.

Both Mr. Torjagbo and the Government have filed motions in limine, docs. 160, 161. Mr. Torjagbo asks that the parties' responses be made due on February

25 and that the replies be made due on March 11. The Defense needs the additional time for several reasons. First, the Defense needs additional time to review a recent discovery production of data extracted from a cell phone that the Government seized from Mr. Torjagbo. Undersigned counsel certain needs to review certain records and documents and to determine whether and to what extent those materials should be produced to the Government. Undersigned counsel is also awaiting a response to a certain subpoena for documents and records. The parties' motions in limine may need to be supplemented as a result of these matters.

A hearing is scheduled for February 12, 2025 on Mr. Torjagbo's pending pro se motion to dismiss and replace appointed counsel. Pending the outcome of the hearing, undersigned counsel will have greater clarity on whether to undertake certain actions on Mr. Torjagbo's behalf.

Undersigned counsel has communicated with counsel for the Government, Kelly Connors, regarding this motion. Ms. Connors has informed undersigned counsel that she is not opposed to this motion. Additionally, undersigned counsel posits that this request for extension of time does not impact the Speedy Trial calculation under 18 U.S.C. § 3161.

WHEREFORE, Mr. Torjagbo asks that this motion be granted.

DATED: This 6th day of February, 2025.

Respectfully submitted,

S/ Kendal D. Silas

KENDAL SILAS

State Bar No. 645959

Attorney for CARL TORJAGBO

Federal Defender Program, Inc.
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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the Unopposed Motion for Extension of Time to File Responses to Motions in Limine, formatted in Times New Roman 14-pt., upon:

Kelly K. Connors, Esq.
Assistant United States Attorney
Federal Courthouse, Ste. 600
75 Ted Turner Drive, S.W.
Atlanta, GA 30303

Nicholas Evert, Esq.
Assistant United States Attorney
Federal Courthouse, Ste. 600
75 Ted Turner Drive, S.W.
Atlanta, GA 30303

by electronically filing the same through the Court's ECF system.

Dated: This 6th day of February, 2025.

s/ Kendal D. Silas

KENDAL SILAS, Esq.

Attorney for CARL TORJAGBO