

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

UNITED STATES	)	
	)	
v.	)	
	)	INDICTMENT NO.
CARLA JACKSON,	)	1:20-CR-00296-JPB-AJB-05
Defendant	)	
_____	)	

UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE PRETRIAL MOTIONS

Defendant CARLA JACKSON, through his counsel, respectfully
requests a 60-day time extension through October 20, 2020 in which to
file pretrial motions in this case. In support, Defendant states the following:

1.

Ms. Jackson is named in the above referenced indictment charging her
with money laundering violations under 21 U.S.C. § 1956. Ms. Jackson's
pretrial conference is scheduled for August 24, 2020 with pretrial motions
presently due by August 21, 2020. (Doc. No. 41).

2.

The Government has just mailed discovery out to undersigned
counsel, which counsel – as yet – has not had a chance to review. Counsel
still needs additional time to review discovery, to discuss such discovery
with the Defendant, and to determine if any pretrial motions should be filed.

Counsel's current caseload obligations also factor into his request for a time extension. These other obligations include counsel's preparation of two appellate briefs to the Eleventh Circuit Court of Appeals and to the Georgia Court of Appeals, briefs for which are both due during the next few weeks.

3.

Because of the above, **Defendant requests an extension through October 20, 2020 in which to file any pretrial motions, a 60-day extension from the current deadline.**

4.

Undersigned counsel has discussed Defendant's time extension request with AUSA Tal Chaiken and Ms. Chaiken has indicated that the Government has no objection.

5.

Defendant further requests that the time extension in which to file pretrial motions be excluded under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7).

Respectfully submitted this 18th day of August, 2020.

/s/ David D. Marshall
David D. Marshall
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CERTIFICATE OF SERVICE

This is to certify that the foregoing was formatted in 14-point Times Roman, in accordance with Local Rule 5.1C, and 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:

All defense counsel; All AUSA's of record

This 18th day of August, 2020.

/s/ David D. Marshall
David D. Marshall
Attorney for Defendant
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