

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 30-day time extension through March 24, 2021 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 February 24, 2021 with pretrial motions
presently due by February 22, 2021.

2.

The Government has mailed its initial discovery out to undersigned
counsel, which counsel is still reviewing and discussing with Defendant. The
Government also has mailed out supplemental discovery, which is somewhat
voluminous and which counsel is still reviewing. Counsel would appreciate

additional time from the Court to review the original and supplemental discovery, and to discuss these materials with Defendant. Counsel will also need to determine if any pretrial motions should be filed.

3.

Because of the above, **Defendant requests an extension through March 24, 2021 in which to file any pretrial motions, a 30-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 17th day of February, 2021.

/s/ David D. Marshall
David D. Marshall
Attorney for Defendant
Georgia Bar No. 471517

2550 Sandy Plains Road
Suite 225 PMB 349

Marietta, Georgia 30066
(404) 213-1358 (phone)
(678) 868-2241 (fax)
ddmarshall98@gmail.com

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 17th day of February, 2021.

/s/ David D. Marshall
David D. Marshall
Attorney for Defendant
Georgia Bar No. 471517

2550 Sandy Plains Road
Suite 225 PMB 349
Marietta, Georgia 30066
(404) 213-1358 (phone)
(678) 868-2241 (fax)
ddmarshall98@gmail.com