

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 14-day time extension through April 12, 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 April 1, 2021 with pretrial motions
presently due by March 29, 2021.

2.

The Government has mailed its initial discovery out to undersigned
counsel, which counsel has been reviewing and discussing with Defendant.
The Government also has mailed out supplemental discovery, which counsel
still needs some additional time to review. 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 April 12, 2021 in which to file any pretrial motions, a 14-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 26th day of March, 2021.

/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 26th day of March, 2021.

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

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