

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

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
DARRELL THOMAS,)
)
Defendant.)
_____)

CASE NO.: 1:20-CR-00296-JPB-AJB

UNOPPOSED MOTION TO CONTINUE DEFENDANT’S SENTENCING

COMES NOW Defendant, **DARRELL THOMAS**, by and through his undersigned counsel, and respectfully moves this Court to continue Defendant’s sentencing date for at least sixty days. In support thereof, Defendant shows as follows:

1.

Defendant’s sentencing is currently scheduled for March 17, 2022.

2.

Counsel for Defendant are scheduled to begin a murder trial on March 14, 2022 in the case of *State v. Camron Golden*, Rockdale County Superior Court¹. It is expected that this trial will last approximately two weeks. Therefore, both parties agree that it will be in their interests and the interests of the Court to continue Defendant’s sentencing for a

¹ This trial was rescheduled from January, 2022 to March, 2022 due to a death in Attorney Howard Weintraub’s family.

period of at least thirty days so that counsel will have sufficient time to prepare for Defendant's sentencing hearing in light of this conflict.

3.

The government has advised undersigned counsel that it does not oppose the granting of this Motion.

WHEREFORE, for all of the foregoing reasons, Defendant respectfully prays that this Court grant this request and continue his sentencing for at least thirty days.

This, the 18th day of January, 2022.

Respectfully submitted,

s/ Benjamin Black Alper

BENJAMIN BLACK ALPER

Georgia Bar No. 940406

Attorney for Defendant Darrell Thomas

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CERTIFICATE OF COMPLIANCE

This is to certify that to the best of my knowledge this document has been prepared with one of the font and point selections approved by the Court in LR 5.1B, pursuant to LR 7. Specifically, the above-mentioned document has been prepared using Times New Roman font, 14 point.

This, the 18th day of January, 2022.

s/ Benjamin Black Alper

BENJAMIN BLACK ALPER
Georgia Bar No. 940406
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the above date, I electronically filed this document using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Respectfully submitted,

s/ Benjamin Black Alper
BENJAMIN BLACK ALPER
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