

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

UNITED STATES OF AMERICA

Plaintiff,

v.

DEREK PARKER, et al.

Defendant

Case No. 1:20-CR-296-JPB-AJB

**UNOPPOSED MOTION TO CONTINUE
PRETRIAL MOTION DEADLINE AND PRETRIAL CONFERENCE**

Defendant Derek Parker, by and through counsel, respectfully files this Unopposed Motion to Continue the Pretrial Motion Deadline and the Pretrial Conference currently scheduled for August 12 and August 23, 2021, respectively, showing the Court as follows:

1. A grand jury sitting in the Northern District of Georgia returned the above-referenced indictment against Mr. Parker and 14 co-defendants on July 13, 2021 (Doc. 135) [First Superseding Indictment]. Mr. Parker is not in custody.
2. The Indictment alleges multiple fraud and money laundering schemes involving over a dozen allegedly fraudulent CARES Act Paycheck Protection Program loan applications submitted to various lenders by different businesses (*Id.*).

3. On July 21, 2021, the Court appointed the undersigned counsel to represent Mr. Parker in this case pursuant to the Criminal Justice Act of 1964, 18 U.S.C. § 3006A (Doc. 221).
4. Undersigned counsel has not yet had an opportunity to review the discovery in this matter, but understands that it involves a large volume of materials requiring a 64GB hard drive.
5. The court-ordered deadline for the filing of pretrial motions is August 12, 2021, and the pretrial conference is scheduled for August 13, 2021 (Doc. 258).
6. Mr. Parker respectfully requests that the Court continue the pretrial conference and pretrial motion deadline for sixty days to afford counsel additional time to review and analyze the discovery, assess any necessary pretrial motions, evaluate potential pretrial resolutions and confer with the prosecutors, and to confer with and advise Mr. Parker.
7. Mr. Parker further requests that any delay caused by the requested extension be excluded from Speedy Trial Act computations because there is good cause for the extension, a continuance is needed to allow reasonable time necessary for effective representations to prevent a

miscarriage of justice, and the defendant's interests in a speedy trial.

See 18 U.S.C. §§ 3161(h)(7)(A), 3161(h)(7)(B)(i) & (iv).

8. No previous continuances have been requested or obtained.
9. The undersigned counsel has conferred with counsel for the government about a continuance, and the government has stated that it does not oppose a continuance.

WHEREFORE, Defendant Parker requests that the pretrial motion deadline in this case be extended for sixty days, until October 11, 2021, and that the pretrial conference be rescheduled accordingly on a date agreeable to the Court and the parties.

Respectfully submitted, this 9th day of August, 2021.

/s/ Kamal Ghali
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed this day with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

This 9th day of August, 2021.

/s/ Kamal Ghali
Kamal Ghali
Georgia Bar No. 805055