

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
At Chattanooga**

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:21-Cr-069-CAE-CHS

v.

DONNA J. CLARK,

Defendant.

UNOPPOSED MOTION TO CONTINUE SCHEDULED DATES

Defendant Donna J. Clark, through undersigned counsel, respectfully requests that this Honorable Court allow an additional 30 days on the dates currently scheduled in this case. The pretrial motion and plea deadlines are September 14 and trial is scheduled for October 5, 2021.

(Doc. No. 6)

A federal grand jury indicted Ms. Clark on charges of fraud, money laundering, and unlicensed money transmittal. (Doc. No. 1) On August 31, undersigned counsel received 500 pages of supplemental discovery, along with many discs containing recorded conversations. While undersigned counsel has reviewed much of the original discovery with Ms. Clark, the supplemental discovery will take a significant amount of additional time to review and summarize. Therefore, Ms. Clark requests more time to complete her discovery review in order to enable her to make a fully informed decision as to whether to proceed to trial. This request is not made for the purpose of undue delay, but to provide effective assistance of counsel to Ms. Clark. Assistant United States Attorney Steve Neff is aware of, and does not oppose, Ms. Clark's request.

Respectfully submitted,

FEDERAL DEFENDER SERVICES
OF EASTERN TENNESSEE, INC.

By: /s/ Gianna Maio

Gianna Maio
Assistant Federal Defender
835 Georgia Avenue, Suite 600
Chattanooga, Tennessee 37402
Gianna_Maio@fd.org
(423) 756-4349
BPR # 24579