

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

|                          |   |                       |
|--------------------------|---|-----------------------|
| UNITED STATES OF AMERICA | ) |                       |
|                          | ) |                       |
| v.                       | ) | CASE NOS.:            |
|                          | ) |                       |
| MARK SARGENT and         | ) | 1:20-cr-228-MHC-JKL-4 |
| MICHAEL SARGENT,         | ) | 1:20-cr-228-MHC-JKL-3 |
|                          | ) |                       |
| Defendants.              | ) |                       |
| _____                    | ) |                       |

UNOPPOSED MOTION TO CONTINUE PRETRIAL CONFERENCE

MARK SARGENT and MICHAEL SARGENT, by and through undersigned counsel, hereby file this Unopposed Motion to Continue Pretrial Conference. In support hereof, Defendants state as follows:

1. On November 19, 2020, a grand jury sitting in the Northern District of Georgia returned a superseding indictment charging both Defendants with one count each of conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349 and three counts each of wire fraud in violation of 18 U.S.C. § 1343. (Doc. 96).
2. Defendants pleaded not guilty to the charges on January 27, 2021. (Docs. 146 and 147).
3. On January 29, 2021, the Court entered a pretrial scheduling order and set the pretrial conference for February 11, 2021. (Doc. 149).

4. Undersigned counsel recently received the discovery in the case. The discovery is comprised of over 300 GB of data. Defendants request the Court continue the pretrial conference for at least sixty days to allow Defendants (who reside in Dallas, Texas) the opportunity to thoroughly review the discovery with Counsel and consider pretrial motions. The ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial and failure to grant a continuance would deny counsel for Defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Moreover, undersigned counsel requests that the Clerk be directed to exclude the additional time pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

5. The Government does not object to this Court's granting this motion.

WHEREFORE MARK SARGENT and MICHAEL SARGENT request that this motion be granted and the pretrial conference be continued for at least sixty days.

Respectfully submitted this 2nd day of February, 2021.

/s/ Mark A. Campbell

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was formatted in 14-point Times New Roman font in compliance with Local Rule 5.1B 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 all parties of record.

Respectfully submitted this 2nd day of February, 2021.

/s/ Mark A. Campbell

Mark A. Campbell

s/ Sandra L. Michaels

Sandra L. Michaels