

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

UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE No.
	)	1:20-CR-228-MHC-JKL
	)	
MAURICE FAYNE,	)	
<u>Defendant.</u>	)	

Comes now Maurice Fayne, by and through his counsel of record, and hereby files this motion for extension of time to file pretrial motions and to hold the pretrial conference and respectfully show as follows:

1. Mr. Fayne was initially charged via complaint on May 12, 2020. Doc. 1.
2. An indictment was filed on June 24, 2020. Doc. 17. A first superseding indictment was filed July 28, 2020. Doc. 41. A second superseding indictment was filed on November 19, 2020. Doc. 96.
3. Present counsel was appointed to represent Mr. Fayne on January 12, 2021. Doc. 137.
4. Counsel received the initial discovery on Tuesday, February 2, 2021. Counsel received an additional production on April 2, 2021. This production contains information that was seized from Mr. Fayne's residence, but that was removed from Mr. Fayne's initial discovery because it may contain privileged information. Counsel requested these removed materials

when she learned that some of Mr. Fayne's attorney/client privileged information may have been seized in this case.

5. Pretrial motions are currently due on April 12, 2021. The pretrial conference is scheduled for April 13, 2021.
6. Counsel anticipates needing additional time to review the discovery and to determine what, if any, pretrial motions should be filed in this case. For that reason, counsel is requesting a continuance of the pretrial motions deadline and the pretrial conference in this case.
7. Counsel asserts that the additional time will also give the parties time to determine if a resolution can be had in the case that may alleviate the need for pretrial motions.
8. Counsel has a previously requested leave from April 5-9, 2021. Doc. 172.
9. For these reasons, counsel is requesting an additional 30-days to file pretrial motions and to hold the pre-trial conferences. Counsel discussed this request with Assistant United States Attorney Russell Phillips, counsel for the government in this case, who has no objection.

10. Counsel requests that the time of the extension to file motions and complete the pretrial conference be excluded under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7).

Respectfully submitted this 3rd day of April 2021.

s/Saraliene S. Durrett
SARALIENE S. DURRETT

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date electronically filed the foregoing motion to continue with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney(s) of record:

All Defense Counsel

All AUSAs of record

Respectfully submitted this 3rd day of April 2021.

s/Saraliene S. Durrett
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