

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.	)	
_____	)	

SECOND UNOPPOSED MOTION
TO CONTINUE PRETRIAL CONFERENCE

MARK SARGENT and MICHAEL SARGENT, by and through undersigned counsels, hereby file this Second 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. On February 2, 2021, undersigned counsels filed a motion to continue the pretrial conference. (Doc. 150). This Court granted the motion and continued the pretrial conference to April 13, 2021 and set a deadline for the filing pretrial of motions on April 12, 2021. (Doc. 151).

5. Undersigned counsels received the discovery in the case which is comprised of over 300 GB of data. Undersigned counsels request the Court continue the pretrial conference for at least thirty days to allow Defendants (who reside in Dallas, Texas) the opportunity to thoroughly review the discovery with counsels and consider pretrial motions. In addition, Mark Sargent has substantial health issues that he is documenting for the Government and the Court. 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 counsels requests that the Clerk be directed to exclude the additional time pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

6. 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 thirty days.

Respectfully submitted this 11th day of April, 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 11th day of April, 2021.

/s/ Mark A. Campbell
Mark A. Campbell

/s/ Steve Jumes
Steve Jumes