

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

ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	1:20-CR-228-2 (MHC) (JKL)
	)	
	)	
DANIEL ERIC JAY	)	
_____	)	

MOTION TO CONTINUE PLEA DATE

COMES NOW the Defendant, DANIEL ERIC JAY, and moves this Honorable Court to continue his plea date to December 14, 2021, or a later date which is convenient to all the parties. In support of this request, Defendant shows as follows:

1.

Mr. Jay's case was certified ready for trial or plea on September 8, 2021. (Doc. 214). The parties are making progress towards resolving this case without a trial. Mr. Jay lives in western Pennsylvania and is free on bond.

2.

At this time, Mr. Jay and his counsel request and require additional time to review the discovery and the proposed loss and restitution amounts, to review the the proposed charges in a criminal information, and to resolve the final terms of

the plea agreement.

3.

The Defendant recognizes and *agrees* that the continuance requested pursuant to this request serves the best ends of Justice, is in the interest of the Defendants and the public and is excluded under the Speedy Trial Act, Title 18 U.S.C. § 3161(h).

WHEREBY, DANIEL ERIC JAY requests that his case be continued to December 14, 2021, or a later date convenient to the parties, for purposes of entering a guilty plea.

Dated: This 5th day of October, 2021.

Respectfully submitted,

s/ L. Burton Finlayson

L. BURTON FINLAYSON

Attorney For DANIEL JAY

Georgia Bar Number: 261460

LAW OFFICES OF
L. BURTON FINLAYSON, LLC
931 Ponce de Leon Avenue, NE
Atlanta, Georgia 30306
(404) 872-0560
lbfcourts@aol.com

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing Motion to Continue with the Clerk of Court using the CM/ECF system which will automatically send email notifications of such filing to all counsel of record including the following:

Mr. Russell Phillips .
Assistant United States Attorney
600 U.S. Courthouse
75 Ted Turner Drive, S. W.
Atlanta, Georgia 30303

DATED: This 5th day of October, 2021.

s/ L. Burton Finlayson

L. BURTON FINLAYSON
ATTORNEY FOR DANIEL JAY
State Bar Number: 261460