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 TRIAL

COMES NOW the Defendant, DANIEL ERIC JAY, and moves this Honorable Court to set or continue his trial to June 6, 2022, or a later date which is convenient to all the parties. In support of this request, the Defendant shows as follows:

1.

At this time, Mr. Jay and his counsel request and require additional time to prepare for trial. Mr. Jay lives in Pennsylvania, his counsel is in Atlanta, Georgia. Given the logistic and geographic distance, compounded by the COVID-19 pandemic, the amount of discovery, the number of witnesses and the complexity of legal issues in this case, the Defendant and his counsel require and request additional time to prepare.

2.

Counsel for the government, AUSA RUSSELL PHILIPS, agrees to this continuance.

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 trial be continued to June 6, 2022, or to a later date convenient to the Court and the parties.

Dated: This 4th day of February, 2022.

Respectfully submitted,

s/ *L. Burton Finlayson*
L. BURTON FINLAYSON
Attorney For DANIEL JAY
Georgia Bar Number: 261460

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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 4th day of February, 2022.

s/ *L. Burton Finlayson*

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