

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

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

AUG 25 2020

By:  JAMES N. HATTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA
Plaintiff,

v.

CASE NO. 1:20-CR-00228-MHC-JKL

MAURICE FAYNE,
FICTITIOUS DEFENDANT
Defendant,

UNOPPOSED MOTION REQUESTING
CONTINUANCE OF PRETRIAL CONFERENCE AND ADDITIONAL
TIME TO FILE MOTIONS

COMES NOW, fayne, maurice johnson el, real party interest, a Moor American National, but not a citizen of the United States, hereby respectfully moves the Court for a continuance of the pretrial conference, currently scheduled for August 27, 2020. Defendant also moves for extension of motions deadline currently set for August 26, 2020. In support, real party in interest shows as follows:

MAURICE FAYNE has been indicted on violation of wire fraud, bank fraud, money laundering and False Statements to Federally-Insured Bank. Defendant just received initial discovery on this case last week. At the status

conference on August 14, 2020, the Government advised is would be producing additional discovery, referencing the need for the alleged defendant to provide a two (2) terabyte hard drive in order to receive the additional discovery. The real party in interest, fayne, maurice johnson el will need time to receive discovery and review it to assess which pre-trial motions should be filed. Additionally the Government has noticed Defendant that it would like to keep all defendants on the same track during the duration of the case.

In consideration of the above, the alleged Defendant respectfully requests an extension of sixty (60) days beyond the current deadline to review this discovery and file appropriate motions, such that motions will be due by on or about October 26, 2020, with the pretrial conference to be held later.

The Government has been consulted, and does not oppose the instant motion.

WHEREFORE, fayne, maurice johnson el, respectfully requests that the Court extend the motions deadline for sixty (60) days and continue the pretrial conference as requested. A proposed order is enclosed for the Court's consideration.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted this 10th day of August, 2020, by:

maurice johnson el
fayne, maurice johnson el, *real party in interest*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Suppress Criminal Affidavit and all other Evidence has been formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1B, and was electronically filed this day with the Clerk of Court using CM/ECF system which will automatically send email notification of such filing to the following counsel of record:

Russell Phillips
Office of the United States Attorney
Richard Russell Federal Building
75 Ted Turner Drive, SW #600
Atlanta, GA 30303-3309

This 25th of August 2020.

maurice johnson el
fayne, maruice johnson el