

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

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
HARRESCIA HOPKINS,)
)
Defendant.)
_____)

CASE NO.: 1:22-cr-00284-SEG-CMS-1

**UNOPPOSED MOTION FOR EXTENSION OF TIME WITHIN WHICH TO
FILE PRETRIAL MOTIONS AND TO CONTINUE THE PRETRIAL
CONFERENCE**

COMES NOW Defendant, **HARRESCIA HOPKINS**, by and through her undersigned counsel, and pursuant to LCrR 12.1B. NDGa, respectfully moves this Court for additional time within which to file pretrial motions in this case and to continue the pretrial conference. In support of this Motion, Defendant shows as follows:

1.

Undersigned counsel has not yet completed a review of the discovery in this case.

2.

Given that undersigned counsel has not yet completed a review of discovery, and given undersigned counsel's other case commitments, Defendant respectfully requests that he have an additional sixty (60) days within which to review this discovery and to file pretrial motions in this case, to and including, November 6, 2022.

3.

The government has advised undersigned counsel that it does not oppose the granting of this Motion.

4.

Under 18 U.S.C. § 3161(h)(7)(A) and (B), the period of delay caused by the granting of this motion is excluded in the computation of the time within which the trial in the instant case must commence. That is, this period of delay is a result of the request of Defendant's counsel and the ends of justice served by the granting of this motion outweigh the best interests of the public and Defendant in a speedy trial in that the failure to grant such continuances would result in a miscarriage of justice; would deny Defendant's counsel time for adequate preparation for pretrial proceedings and would deny Defendant the "reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. § 3161(h)(7)(A)and(B).

5.

Undersigned counsel states herein that Defendant has expressly authorized the filing of this motion for an extension of time within which to file pretrial motions and to continue the pretrial conference and waives any speedy trial time restraints.

WHEREFORE, for all the foregoing reasons, Defendant respectfully prays that this Court grant him additional time within which to file his pretrial motions, to and including November 6, 2022.

This, the 30th day of August, 2022.

Respectfully submitted,

s/ Benjamin Black Alper

BENJAMIN BLACK ALPER

Georgia Bar No. 940406

Attorney for Harrescia Hopkins

ALPER LEGAL, P.C.

1205 Johnson Ferry Road

Suite 136, #359

Marietta, Georgia 30068

404.736.3939

ben@alperlegal.com

CERTIFICATE OF COMPLIANCE

This is to certify that to the best of my knowledge this document has been prepared with one of the font and point selections approved by the Court in LR 5.1B, pursuant to LR 7. Specifically, the above-mentioned document has been prepared using Times New Roman font, 14 point.

This, the 30th day of August, 2022.

Respectfully submitted,

s/ Benjamin Black Alper

BENJAMIN BLACK ALPER

Georgia Bar No. 940406

Attorney for Harrescia Hopkins

ALPER LEGAL, P.C.
1205 Johnson Ferry Road
Suite 136, #359
Marietta, Georgia 30068
404.736.3939
ben@alperlegal.com

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

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
HARRESCIA HOPKINS,)
)
Defendant.)
_____)

CASE NO.: 1:22-cr-00284-SEG-CMS-1

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the above date, I electronically filed this document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Respectfully submitted,

s/ Benjamin Black Alper

BENJAMIN BLACK ALPER

Georgia Bar No. 940406

Attorney for Harrescia Hopkins

ALPER LEGAL, P.C.
1205 Johnson Ferry Road
Suite 136, #359
Marietta, Georgia 30068
404.736.3939
ben@alperlegal.com