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

) CIVIL ACTION NO.
1:23-CV-03721-SCJ
)
RE: NOTICE OF REMOVAL
OF FULTON COUNTY
SUPERIOR COURT
) INDICTMENT NO.
) 23SC188947

## STATE OF GEORGIA'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

On August 21, 2023, Defendant Jeffrey Bossert Clark filed a Notice of Removal in this Court seeking to remove Case Number 23SC188947 from the Fulton County Superior Court. Doc. [1]. On August 24, this Court set a hearing date of September 18 and directed the State of Georgia to file any response to the defendant's Notice by Tuesday, September 5, 2023. Doc [15].

On August 28, 2023, the State of Georgia participated in an evidentiary hearing concerning a Notice of Removal in a related matter, State of Georgia v. Mark R. Meadows, Case Number 1:23-cv-03621-SCJ, also before this Court. The following day, the Court requested supplemental briefing from the parties in that case, to be submitted by 5 p.m. tomorrow, August 31, 2023.

In light of this fact, and in order to facilitate the State of Georgia's ability to thoroughly respond to the defendant's Notice in this case and to filings made in other related matters currently pending before the Court, the State respectfully requests that this Court grant a three-day extension of time for filing its response to the defendant's Notice. If granted, the extension would change the due date for any response from Tuesday, September 5, to Friday, September 8.

The undersigned has communicated with counsel for the defendant, who does not object to the State of Georgia's request.

Respectfully submitted, this 30th day of August 2023.

FANI T. WILLIS DISTRICT ATTORNEY ATLANTA JUDICIAL CIRCUIT

By:

By: s/F. McDonald Wakeford

F. McDonald Wakeford Chief Senior Assistant District Attorney Atlanta Judicial Circuit Georgia Bar No. 414898 136 Pryor Street SW, Third Floor Atlanta, Georgia 30303 fmcdonald.wakeford@fultoncountyga.gov

## **CERTIFICATE OF COMPLIANCE**

The undersigned counsel hereby certifies that this pleading complies with the Local Rules of this Court, including Local Rules 5.1.C and 7.1.D (N.D. Ga.) in that it is double-spaced and composed in 14-point Times New Roman font.

This 30th day of August 2023.

s/ F. McDonald Wakeford

F. McDonald Wakeford Chief Senior Assistant District Attorney Atlanta Judicial Circuit Georgia Bar No. 414898 136 Pryor Street SW, Third Floor Atlanta, Georgia 30303 Fmcdonald.wakeford@fultoncountyga.gov

## **CERTIFICATE OF SERVICE**

I hereby certify the foregoing was served upon the following by email and by service from this Court's electronic filing system, as well as via first class mail postage prepaid to:

Harry W. MacDougald CALDWELL, CARLSON, ELLIOTT & DELOACH LLP Two Ravinia Drive, Suite 1600 Atlanta, Georgia 30346 hmacdougald@cccedlaw.com

Attorney of record for Defendant Jeffrey Bossert Clark

Dated this 30th day of August, 2023.

s/F. McDonald Wakeford

F. McDonald Wakeford