

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)
)
 Plaintiff,)
)
 vs.) CASE NO.: 23SC188947
)
 DONALD JOHN TRUMP, et al.,)
)
 Defendants.)
)
 _____)

MEADOWS' MOTION TO EXTEND PRETRIAL DEADLINES

COMES NOW, Mark R. Meadows, by and through undersigned counsel, and respectfully moves this Court for a relatively brief extension of his pretrial deadlines, showing the Court as follows:

1.

This Court has set the following deadlines for Meadows and the other remaining Defendants: (1) initial discovery productions by December 4, 2023 and (2) pretrial motions filed by January 8, 2024. The Court has the discretion to further extend these deadlines "as the ends of justice require." O.C.G.A. § 17-8-22.

2.

Without delay, Meadows filed a Notice of Removal in the U.S. District Court for the Northern District of Georgia. See Georgia v. Meadows, No. 1:23-cv-03621-SCJ (N.D. Ga.). On the same day his removal was denied by the District Court, Meadows filed a Notice of Appeal with the Eleventh Circuit. See Georgia v. Meadows, No. 23-

12958 (11th Cir. Sept. 13, 2023). The Eleventh Circuit granted Meadows’ request that his appeal be heard on an expedited schedule. Id., ECF 17. Oral argument on Meadows’ appeal is set for December 15, 2023. Id., ECF 65-1.

3.

In connection with his federal removal action, Meadows earlier moved this Court for a complete stay of the state proceedings. On September 14, 2023, the Court denied Meadows’ motion “to the extent [it] request[ed] a complete stay in this Court pending appellate resolution of the removal action[]” (Doc. 28 at 6).

4.

Meadows specifically requests a limited extension of his discovery production deadline, from December 4, 2023 to February 5, 2024, and of his pretrial motions deadline, from January 8, 2024 to March 4, 2024. The request for a relatively brief extension is made in an effort to prevent Mr. Meadows from having to litigate the same case simultaneously in two separate courts while the Eleventh Circuit decides on an expedited schedule, the removal action.

5.

Given the upcoming 2024 trial schedules of numerous defense counsel in this case and the scheduled 2024 federal criminal trials of former President Trump, a modest extension of Meadows’ pretrial deadlines would not prejudice the State or any other Defendant.

6.

The undersigned requests that this motion be heard during the Court's scheduled December 1, 2023 motions hearing.

Respectfully submitted on this 14th day of November, 2023.

**GRIFFIN DURHAM TANNER &
CLARKSON, LLC**

By: /s/ James D. Durham

James D. Durham

Georgia Bar No. 235515

jdurham@griffindurham.com

104 West State Street, Suite 200

Savannah, GA 31401

Ph/Fax: 912-867-9140

*Attorney for Defendant Mark Randall
Meadows*

CERTIFICATE OF SERVICE

I hereby certify I electronically filed the foregoing document with the Clerk of Court using Odyssey Efile Georgia electronic filing system that will send notification of such filing to all parties.

This 14th day of November, 2023.

**GRIFFIN DURHAM TANNER &
CLARKSON**

By/s/ James D. Durham

James D. Durham
Georgia Bar No. 235515
jdurham@griffindurham.com
104 West State Street, Suite 200
Savannah, GA 31401
Ph/Fax: 912-867-9140

*Attorney for Defendant Mark Randall
Meadows*