

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

United States of America,  
Plaintiff,

v.

Jodie Marie Mann (2)  
Defendant.

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No. SA-18-CR-390-2-OLG

**JOINT MOTION TO EXTEND FILING DEADLINE**

The United States of America and Defendant Jodie Marie Mann move the Court to continue the filing deadline in the Court's August 4, 2022, Order requiring Mann and the Government to respond to five questions relating to severance issues pending before the Court, ECF 226. The Government and Mann ask for an extension of the filing deadline to August 26.

In its Order, the Court posed five questions and ordered the Government and Mann to respond by August 18, 2022. Today, August 17, 2022, the Government and Mann received notice that Mann's co-defendant, Robert Mikel Ussery, intends to plead guilty to the indictment and will do so before a magistrate judge on August 23, 2022. *See* ECF 229.

If Ussery does plead guilty to all counts and the Court accepts his guilty plea, the severance issue will be moot given that Mann would be the only remaining defendant set for trial in this case. If Ussery decides to plead guilty to one count, but not the other—or if he decides not to plead guilty—extending the deadline to August 26 will allow the Government and Mann sufficient time to tailor their responses to the current state of affairs.

The undersigned counsel for the Government and Mann conferred regarding this motion and the proposed extension. The Government and Mann agree that an extension is appropriate for the reasons stated above and agree to the proposed alternative deadline of August 26, 2022.

The Government and Mann ask the Court to grant this motion to avoid unnecessary briefing and/or to provide briefing that is tailored to the circumstances of this case as they exist after Ussery's plea hearing set on August 23.

/s/ George W. Aristotelidis

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CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of the foregoing instrument with the Clerk of the Court using the CM/ECF System, which will transmit notification of such filing to counsel of record to counsel for Defendants.

/s/ Kelly Stephenson  
Kelly G. Stephenson  
Assistant United States Attorney

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ORDER

Having considered the Joint Motion to Extend Filing Deadline and all records and proceedings before it in this matter:

IT IS HEREBY ORDERED that the Government and Defendant Jodie Marie Mann are granted an extension of time to respond to the Court’s Order, ECF No. 226, and their responses are due on or before August 26, 2022.

SIGNED AND ENTERED \_\_\_\_\_, 2022.

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THE HONORABLE ORLANDO L. GARCIA  
CHIEF UNITED STATES DISTRICT JUDGE