

Driftwood LNG LLC, Driftwood Pipeline LLC, Louisiana LNG Energy LLC and Tellurian Services LLC; which is currently set for trial in the 61st District Court (Cause 2017-49685 and cause #2019-11559). This three-year-old case is preferentially set for trial on February 3, 2019 and is projected to last until March 5, 2020. All motions for continuance have been denied. Nearly all of counsel's time for the last six weeks has been spent in preparation for this trial.

2. There is voluminous discovery in the instant case, which the government turned over on January 9, 2020. Much of this is comprised of financial documents and counsel has retained a consultant to evaluate this information in order to be able to confront it at trial. To date, however, this has not been completed and will not be for at least another thirty to sixty days. In addition, there are additional financial records for which counsel is awaiting the password information so that they may be accessed.

3. This Court previously granted an extension so that counsel could evaluate discovery prior to filing motions; however since the discovery was not produced until January 9 and counsel was already in the process of preparing for the Parallax trial; he has not been able to effectively evaluate the discovery and prepare motions. It is likely that at least one dispositive motion will be filed.

4. Because of the nature and volume of evidence in this case; counsel believes that this case should be designated as a Complex Case. The financial records

involved, as well as campaign related documents go back for a period of years and the allegations cover a fairly vast amount of time.

5. Due to the unusual and complex nature of the case, it is unreasonable to expect adequate preparation for pretrial proceedings and the trial itself within the time limits established by the Speedy Trial Act.

6. The parties agree that failure to grant a continuance in this case would deny the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice.

Respectfully submitted,

/s/ Kent A. Schaffer

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ALEXANDRA SMOOTS-THOMAS

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL No. 4:19-786
	§	
ALEXANDRA SMOOTS-THOMAS	§	

CERTIFICATE OF CONFERENCE

Counsel for defendant conferred with AUSA Ted Imperato concerning his position on Defendant's Motion for Continuance. Mr. Imperato stated that the Government is unopposed to this motion.

/s/ Kent A. Schaffer
Kent A. Schaffer

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an email notification of this filing to all registered parties.

/s/ Kent A. Schaffer
Kent A. Schaffer