

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

UNITED STATES OF AMERICA

v.

Case No. 2:21-cr-74-JLB-MRM

AMBER REWIS BRUEY
_____ /

**MOTION TO CONTINUE
HEARING SET FOR MAY 12, 2023**

COMES NOW, the Defendant, Amber Rewis Bruey, by and through undersigned counsel and pursuant to Local Rule 3.08,¹ hereby moves this Honorable Court to continue the hearing scheduled for May 12, 2023, at 2:30 p.m. EST. In support of this motion, Ms. Bruey states:

1. Ms. Bruey filed a motion to extend her report date by 90 days to allow her time to address her own health problems, as well as the new autism diagnosis for one of her children. *See* Doc. 143. A hearing on that motion is currently scheduled for May 12th, 2023, at 2:30 p.m. *See* Doc. 149.

¹ Local Rule 3.08 provides that “[a] party must timely move for a continuance and explain in detail the reason a continuance is warranted and the effort to resolve any scheduling conflict.” It is respectfully submitted that the foregoing motion is made in good faith, and good cause has been shown for granting the requested continuance.

2. Counsel for Ms. Bruey has a personal out-of-state commitment that conflicts with the May 12th hearing date: counsel is scheduled to be out of the Fort Myers area between May 11th to May 14th, 2023. Accordingly, counsel respectfully requests this Court reschedule the hearing to allow her to fulfill her obligations with the prior commitment.

3. Counsel is not seeking to substantially delay the hearing; counsel is available to attend a hearing prior to the current May 12th hearing date, as well as any date after May 14th. Counsel is also available to travel to Tampa as a more convenient forum for this Court.

4. Counsel contacted Assistant United States Attorney Trent Reichling, who does not object to an earlier hearing date, either in Fort Myers or Tampa. Mr. Reichling does oppose moving the hearing to a later date.

5. A continuance would not be an abuse of this Court's discretion and would be in the interest of justice to allow counsel familiar with this motion to come before this Court.

WHEREFORE, the Defendant, Amber Rewis Bruey, respectfully requests this Honorable Court to reschedule the hearing.

Dated: April 20, 2023

Respectfully submitted,

A. Fitzgerald Hall, Esq.
Federal Defender
Middle District of Florida

/s/ Shehnoor Kaur Grewal
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of April 2023, the foregoing was filed with the Clerk of Court and a copy will be sent electronically to Trent Reichling, Assistant United States Attorney.

/s/ Shehnoor Kaur Grewal
Shehnoor Kaur Grewal, Esq.
Appellate Attorney