

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

UNITED STATES OF AMERICA

vs.

Case No.: 8:26-cr-83-KKM-LSG

CALEB WALSH

Defendant.

/

**DEFENDANT’S UNOPPOSED MOTION TO CONTINUE TRIAL AND
TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

COMES NOW the defendant, Caleb Walsh, by and through undersigned counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B) and Local Rule 3.08, and hereby moves this Court to continue the trial currently set for the May 2026 trial term for a period of at least six (6) months, and to extend the deadline to file pretrial motions by an additional 60 days, and in support thereof states the following:

1. Defendant was indicted in this matter on March 10, 2026. Doc. 1.
2. On December March 17, 2026, Defendant filed his Waiver of Presence at Arraignment and Entry of Not Guilty Plea. Doc. 15. That same day, the Court granted Defendant’s Waiver of Presence at Arraignment (Doc. 15).
3. On March 20, 2026, the Court entered its Pretrial Discovery Order and Notice of Trial and Status Conference (the “Pretrial Order”). Doc. 21.
4. In the Pretrial Order, the Court set the deadline for pretrial motions as within thirty (30) days after receipt of the Government’s discovery. The Court also set this case for trial during the May 2026 trial term.

5. Defendant is charged with six (6) counts of bank fraud, one (1) count of wire fraud, and five (5) counts of money laundering.
6. Discovery in this matter, which has not yet been received, is expected to be voluminous. Counsel for the Government has requested a 3 TB (terabyte)¹ hard drive to provide the discovery to defense counsel. It is expected that, given the charges in this case, the discovery will contain volumes of bank and financial records, which will need to be analyzed and scheduled. It is also likely that the defense will need to obtain additional financial and other records in support of its theory and strategy., The defense will be preparing pretrial motions to be heard as well as likely asking the Court to issue pretrial subpoenas under Rule 17, Fed. R. Crim. P. In addition, given the nature of the allegations, there are also a number of defense witnesses that need to be identified, located, and interviewed.
7. Considering 18 U.S.C. 3161(h)(7)(B)(ii), the large amount of data renders this case unusual and complex, and therefore the parties agree it is unreasonable to expect adequate defense preparation for pretrial proceedings or for trial by May 2026.
8. Given the extent of the expected discovery and the necessity of

¹ 3 TB is equivalent to 3,000 GB (gigabytes) and has the ability to store the equivalent of 300 million documents, approximately 850,000 photos, or 300 hours of video files. That is to say, 3 TB is an immense amount of data.

conducting a complex defense investigation, undersigned counsel requests additional time to review the discovery and file any potential pretrial motions. Undersigned further requests the trial be continued for at least six (6) months.

9. Undersigned counsel has conferred with AUSA Christopher Poor, who advises that he has no objection to a 60-day extension of the pretrial motion deadline, and has no objection to a 6-month continuance of the trial term.
10. Pursuant to the Pretrial Order and Local Rule 3.08, Defendant consents to this continuance. Defendant further waives his right to a speedy trial through December 31, 2026.

WHEREFORE, for the reasons stated herein, Defendant respectfully requests that this Court grant the requested relief.

Dated: March 24, 2026

Respectfully submitted,

/s/ Todd Foster

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I filed the foregoing with the Clerk of Court for the Middle District of Florida on this 24th day of March 2026 by uploading it to the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Todd Foster
TODD FOSTER