

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:24-cr-40
	)	
CRAIG DAVID DAVIS,	)	Hon. Patricia Tolliver Giles
	)	
Defendant.	)	Motions Deadline: May 6, 2024

AGREED MOTION TO CONTINUE MOTIONS DEADLINE

COMES NOW the defendant, Craig David Davis, through counsel, who states:

1. The government obtained an indictment in this case on February 15, 2024, charging Mr. Davis with four counts of wire fraud in violation of 18 U.S.C. § 1343. Mr. Davis made his initial appearance in the Eastern District of California on February 21, 2024, and traveled to this jurisdiction for his arraignment on March 7, 2024.
2. At the arraignment, this Court set a motions deadline of 60 days, resulting in a due date of May 6, 2024. Trial was set for October 22, 2024.
3. Since the arraignment, the parties have been in regular contact regarding a potential resolution. Those discussions are in good faith, detailed and progressing. Government counsel is awaiting supervisory approval to seek a resolution along the lines of what the parties have been discussing. As a result, the parties do not anticipate reaching a resolution before the May 6 motions deadline.

4. Additionally, the government has advised that it may seek a superseding indictment in the coming weeks. A superseding indictment could affect the parties' motions calculus, as well as the calendar set for those motions and responses to be due.
5. For these reasons, the parties believe that continuing the motions deadline for 30 days would serve the interests of judicial economy. A continuance would conserve party and judicial resources and may avoid unnecessary, premature or duplicative litigation.
6. Undersigned counsel has conferred with government counsel, who has reviewed and agreed to the filing of this motion.

Accordingly, the defense respectfully moves this Court to continue the motions deadline by 30 days to June 5, 2024. A proposed order is attached.

Respectfully submitted,
CRAIG DAVID DAVIS

By Counsel,
Jeremy C. Kamens
Federal Public Defender

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