

**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: June 5, 2024

SECOND CONSENT 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, and added an additional count in a superseding indictment obtained on May 16, 2024. 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. He waived in-person appearance and appeared through counsel at the arraignment on the superseding indictment on May 23, 2024.
2. Trial has been set for October 22, 2024. On an agreed motion by the defense, the Court previously extended the motions deadline to June 5, 2024.
3. The parties have been in regular contact regarding a potential resolution and upcoming deadlines. The government has extended a written plea offer to the defense, which is under consideration. The government has asked for a definitive response to that proposal by June 21, 2024.

4. In light of that deadline and to avoid the unnecessary expenditure of party and court resources, the defense respectfully moves this Court to extend the motions deadline by three weeks to June 28, 2024. Undersigned counsel has discussed this request with government counsel, who agrees with it.

Accordingly, the defense respectfully moves this Court to continue the motions deadline by three weeks to June 28, 2024. A proposed order is attached.

Respectfully submitted,
CRAIG DAVID DAVIS

By Counsel,
Jeremy C. Kamens
Federal Public Defender

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