

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

**UNITED STATES OF AMERICA,**

**vs.**

**CASE NO.: 4:22-cr-32-MW/MAF**

**FELICIA JACKSON STANLEY  
and  
WILBERT JEAN STANLEY, III,  
Defendants.**

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**UNOPPOSED MOTION TO CONTINUE SENTENCING**

**COMES NOW** the undersigned attorney and files this Unopposed Motion to Continue Sentencing on behalf of the Defendants and would state as follows:

- 1) The above-styled matter is presently calendared for sentencing the afternoon of October 7, 2022.
- 2) Mr. Stanley is in the process of being evaluated by Dr. Stephen Zieman. Dr. Zeiman is a neuro-psychologist who practices in Pensacola, Florida.
- 3) Counsel has undertaken this evaluation because of brain damage Mr. Stanley suffered at a relatively young age in conjunction with other major trauma (electrocution, months long hospitalization, skin grafts, death of mother and death of sister all within 9-12 month period of time during formative teen years).
- 4) It goes without saying that this information is important for the Court's consideration of the §3553(a) factors, but the undersigned has asked an expert to participate in order to better explain Mr Stanley's cognition and overall circumstances.

- 5) Dr. Zieman generally advised counsel that his schedule was such that late November or early December would be the soonest he could have everything accomplished to testify before the Court.
- 6) The undersigned is scheduled to be in a 2 ½ week First Degree Murder trial in *State of Florida v. Zachary Abell* in Franklin County, Florida that will commence after the Thanksgiving holiday. This is a matter specially set with witnesses from across the country and a co-defendant with their counsel. The case is a 2018 case where the Defendants are in custody.
- 7) The foregoing is a long way of requesting a continuance until January. This will allow for a proper sentencing presentation that contemplates the individual circumstances of each Defendant as well as their respective roles and culpabilities.
- 8) The undersigned has conferred with Assistant United States Attorney Justin Keen and he has no objection. The request for a continuance is made in good faith and not solely for the purposes of delay.
- 9) United States Probation Officer April McCommon has been incredibly patient with the undersigned because of her own obligations to the Court.

#### **CERTIFICATE OF COMPLIANCE**

The undersigned Counsel certifies, pursuant to Rule 7.1(B), Local Rules, United States District Court for the Northern District of Florida, that he has conferred with Assistant United States Attorney Justin Keen, and he has **no objection** to the relief sought in this motion. This pleading is 484 words.

RESPECTFULLY SUBMITTED,

/s/ Robert A. Morris

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy hereof has been furnished by Electronic Mail to: Justin M. Keen, Assistant United States Attorney, United States Attorney's Office, 111 N. Adams Street, Tallahassee, Florida 32301 at [justin.keen@usdoj.gov](mailto:justin.keen@usdoj.gov) on this 28<sup>th</sup> day of September, 2022.

RESPECTFULLY SUBMITTED,

/s/ Robert A. Morris

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