

**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.**

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 February 9, 2023.
- 2) Mr. Stanley has been evaluated by Dr. Stephen Zieman. Dr. Zeiman is a neuropsychologist 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) Sentencing was previously scheduled in January and was moved to the present date due to the Court's busy calendar. The undersigned neglected to confer with Dr. Zieman as to his availability for the newly scheduled date. Dr. Zieman is unavailable on February 9, 2023, due to a memorial service for a family member in North Carolina.

- 5) Counsel believes Dr. Zieman's testimony is important for the Court's consideration of the §3553(a) factors. Dr. Zieman's testimony applies directly to Mr. Stanley, but it also applies to Ms. Stanley because it explains how she became involved in the conduct at issue.
- 6) Given the foregoing, the undersigned respectfully requests a continuance of the sentencing presently scheduled for Mr. and Ms. Stanley.
- 7) Counsel understands the Court has an upcoming trial that is expected to be lengthy. To that end, Counsel will coordinate with the Court's Courtroom Deputy as well as Assistant United States Attorney Justin Keen to secure an appropriate date on the Court's calendar.
- 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.

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

ROBERT A. MORRIS, ESQUIRE
Florida Bar No. 0144680
The Law Offices of Robert A. Morris, LLC
911 East Park Avenue
Tallahassee, Florida 32301
(850) 792-1111 Facsimile (850) 792-1113
ATTORNEY FOR DEFENDANTS
alex@ramlawyer.com
efiling@ramlawyer.com

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 on this 19th day of January, 2023.

RESPECTFULLY SUBMITTED,

/s/ *Robert A. Morris*

ROBERT A. MORRIS, ESQUIRE
Florida Bar No. 0144680
The Law Offices of Robert A. Morris, LLC
911 East Park Avenue
Tallahassee, Florida 32301
(850) 792-1111 Facsimile (850) 792-1113
ATTORNEY FOR DEFENDANTS
alex@ramlawyer.com
efiling@ramlawyer.com