

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:23-cr-80154-DMM-1

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GREGORY SCOTT KEOUGH,

Defendant.

_____/

JOINT MOTION TO CONTINUE CALENDAR CALL AND TRIAL

Counsels for Defendant Gregory Scott Keough (hereinafter “KEOUGH”), and Counsel for The United States of America, pursuant to Federal Rules of Criminal Procedure would hereby jointly file this Motion to Continue the Calendar Call and the Trial in the above-styled cause and would state the following:

FACTUAL BACKGROUND

1. On August 24, 2023, the government filed an eleven-count Indictment against KEOUGH.
2. Counsels for the Defendant were retained on August 16, 2023.
3. The calendar call is scheduled for October 25, 2023, at 10:30 a.m., and the trial is scheduled for October 30, 2023, at 9:00 a.m.
4. Defense counsels received a significant amount of discovery from the United States counsel, and additional time is required to read and review it.
5. Additionally, counsels for KEOUGH and counsel for the Government have been engaged in significant plea discussions and counsels believe that plea negotiations are continuing.

6. Defense counsels and the United States respectfully request the continuance of the calendar call and the trial.
7. Defense counsels have contacted defense counsel for the United States who indicated that she joins in this motion to continue the calendar call and the trial.

Dated: October 18, 2023.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 18, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

Respectfully submitted,

/s/ David J. Joffe
DAVID J. JOFFE, ESQUIRE

