

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

CASE NO. 23-cr-60173-KMW

CAAROLYN DENISE WADE,)

Defendant.)

AGREED MOTION TO CONTINUE TRIAL AND CALENDAR CALL

COMES NOW, the Defendant, CAROLYN DENISE WADE (“Wade”), by and through the undersigned attorney, and motions this Court to continue her presently scheduled calendar call and trial by ninety (90) days. In support thereof, Wade states as follows:

1. Prior to filing the instant motion, the undersigned communicated with AUSA David Snider (the prosecutor assigned to the instant matter) who advised the government has no objection to granting the instant motion. The instant motion is Wade’s first motion for continuance of calendar call and trial.

2. On October 19, 2023, Wade was arraigned. On November 3, 2023, the government disclosed its first discovery submission. Calendar call is presently set for December 12, 2023 and trial is set for December 18, 2023.

3. The parties agree to a ninety (90) extension of time so that the Defense may complete discovery. Specifically, the undersigned is in the process of issuing multiple subpoenas to produce documents and records on third parties who the undersigned believes may possess exculpatory evidence that is material to Wade's defense.

4. Additionally, the undersigned attorney has been ordered to appear for jury duty in this district on December 4, 2023 and is therefore unavailable for trial.

WHEREFORE, the Defendant and the undersigned attorney respectfully motion this Court continue the presently scheduled calendar call and trial by ninety (90) days.

Respectfully Submitted,

/s/ Brian Silber

Brian Silber, Esq.

Counsel for Carolyn Denise Wade

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this document was served on the following parties via CM/ECF on November 17, 2023.

SERVICE LIST

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