

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Case No. 23-cr-60173-Williams

Plaintiff,

v.

CAROLYN D. WADE,

Defendant.

_____/

UNOPPOSED MOTION FOR SUBSTITUTION OF COUNSEL

COMES NOW the Defendant, **CAROLYN WADE (Ms. Wade)**, by and through the undersigned Counsel, and files this Unopposed Motion for Substitution of Counsel and further requests this Honorable to accept the stipulation herein below. Ms. Wade would show unto the court the following:

1. Ms. Wade is charged by Indictment with one count of wire fraud, in violation of 18 U.S.C. 1343.
2. A calendar call is currently scheduled for March 18, 2024.
3. Ms. Wade is currently represented by Mr. Brian Silber, Esq., and has contacted the undersigned this week concerning substituting Mr. Silber as attorney-of-record.
4. The undersigned conferred with Mr. Silber on February 14, 2024, and he indicates that he has no objection.
5. The undersigned also conferred with the assigned Assistant United States Attorney David Snider, who also has no objection.
6. If the undersigned is allowed to substitute in as attorney-of-record, the undersigned respectfully requests that this matter be set for April 29, 2024 as the

undersigned starts a state court 5-6-day trial on Tuesday February 20, 2024 and an estimated 4-5-day PPP fraud trial on February 26, 2024, before The Honorable Judge James Cohn (United States v. Stephanie Smith, Case# 23-cr-60203-Bloom). Thereafter, the undersigned has very longstanding plans to be out of the country from March 19 through March 31, 2024. Non-refundable airline tickets and other event tickets have been purchased.

7. The undersigned and AUSA Snider both agree that we can be ready for trial on or after April 2, 2024.

WHEREFORE, Ms. Smith and the undersigned respectfully requests this Honorable Court grants this Unopposed and Stipulated Motion for Substitution of Counsel, and any other relief deemed necessary, appropriate, and fair.

STIPULATION FOR SUBSTITUTION OF COUNSEL

It is hereby stipulated and agreed that in the case of **U.S.A. v. Carolyn D. Wade**, Case No. 23-cr-60173-Williams, Attorney **Johnny L. McCray, JR., Esquire**, shall be substituted as attorney of record in this action for Client, Carolyn D. Wade, in place of **Brian Silber, Esquire**, thereby relieving **Brian Silber, Esquire**, from any further responsibility in this matter. All future pleadings, motions, filings of records and other correspondence should be forwarded to **Johnny L. McCray, Jr., Esquire** on behalf of the named Client, Carolyn D. Wade.

Consent by Client: Carolyn Wade.
Carolyn D. Wade

Brian Silber

BRIAN SILBER, ESQ.

<i>Johnny L. McCray, Jr,</i>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 16, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that the foregoing document is being served this day on all counsel of record via transmission of Notices Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Respectfully Submitted,

/s/ Johnny L. McCray, Jr., Esq.
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