

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Case No. 23-CR60173-KMW

Plaintiff,

v.

CAROLYN WADE,

Defendant.

_____ /

DEFENDANT’S UNOPPOSED MOTION FOR CONTINUANCE

The Defendant, CAROLYN DENISE WADE (“Ms. Wade”), through counsel, respectfully moves to continue the calendar call and trial of this matter. In support thereof, Ms. Wade states the following:

1. Ms. Wade is charged by Indictment with one count of wire bank fraud in connection with a PPP loan application, in violation of 18 U.S.C. Section 1343.
2. Ms. was arraigned on October 19, 2023.
3. This matter is currently scheduled for a calendar call on April 2, 2024, at 11:00 a.m.
4. A jury trial is also scheduled to commence on April 8, 2024, at 9:00 a.m.
5. On February 21, 2024, this Honorable Court entered an Order of Substitution of Counsel granting leave for the undersigned to represent

the interest of Ms. Wade.

6. The undersigned counsel commenced a federal jury trial on February 29, 2024 before the Honorable Judge James Cohn, which ended March 5, 2024. AUSA David Snider was the assigned prosecutor in that case.

7. The undersigned has not yet received discovery; however, the government has represented to the undersigned that they are in the process of providing discovery to the.

8. Once the discovery is received, the undersigned will need additional time to sort through and review.

9. The undersigned counsel has had longstanding plans to be out of the country from March 19, 2024 through March 31, 2024, and has purchased non-refundable airline tickets and hotel accommodations, etc.

10. The undersigned will require additional time to prepare for trial once discovery is received.

11. The undersigned has contacted the assigned Assistant United States Attorney David Snider, who advises he has no objection to continuing the calendar call and trial in this matter.

12. On Monday, May 6, 2024, the undersigned is scheduled to commence jury selection in Broward County in *State of Florida v. Jaslyn Smith*, Case No. 21-10420 CF 10A (Judge Ernest Kollra), a special set three co-defendant first degree murder trial. The expected length of the trial is 5-6 weeks. The current trial date was special set in November,

2023.

WHEREFORE, the Defendant, CAROLYN DENISE WADE, respectfully requests this Honorable Court continue the trial of this matter until at least mid-June, 2024.

By: s/Johnny L. McCray, J. Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 8, 2024, I electronically filed the foregoing motion/document with the Clerk of the Court using CM/ECF. I also certify that the foregoing motion/document is being serving on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing, on this 8th day of March, 2024. /s/ Johnny L.

McCray, Jr.

Johnny L. McCray, Jr., Esquire

Florida Bar No. 342319

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cc: Client