

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-60173-CR-KMW (GRAHAM)

UNITED STATES OF AMERICA

vs.

**CAROLYN DENISE WADE and
TRACY D. WADE,**

Defendants.

**MOTION BY THE UNITED STATES FOR LEAVE TO FILE CONVENTIONALLY
GOVERNMENT EXHIBITS ADMITTED AT TRIAL THAT ARE EXEMPT FROM
MANDATORY ELECTRONIC FILING PURSUANT TO LOCAL RULE 5.3(b)(3)(C)**

The United States of America, by and through its undersigned counsel, files this motion for leave, pursuant to Local Rule 5.3(b)(3)(C), to file conventionally with the Clerk of Court, on a CD, DVD, or other electronic medium, the government's exhibits admitted into evidence during the jury trial of this case that contain voluminous amounts of confidential information, which exhibits are listed on the appendix submitted herewith ("Appendix 1"). Local Rule 5.3(b)(3)(C) exempts from mandatory electronic filing any exhibits containing voluminous amounts of confidential information that is subject to privacy protections in accordance with Fed. R. Civ. P. 5.2, Fed. R. Crim. P. 49.1, or other applicable rule or statute. In this case, the government's exhibits set forth on Appendix 1 contain voluminous amounts of confidential information that is subject to privacy protections in accordance with Fed. R. Civ. P. 5.2, Fed. R. Crim. P. 49.1, or other applicable rule or statute.

Pursuant to Local Rule 88.9, undersigned counsel for the United States contacted attorneys Johnny McCray and Daryl Wilcox, counsel of record for Defendants Carolyn Denise Wade and Tracy D. Wade, via email on October 24, 2024, regarding the relief sought in this motion. As of the filing of this motion, the government has not yet received a response.

For the foregoing reasons, the United States respectfully asks the Court to grant the relief requested herein.

Respectfully submitted,

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