UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA,

v. **CASE NO.: 3:24-cr-166-TJC-LLL**

KEVIN KARL WILLS, JR.,

Defendant.

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF ENTRY OF PLEA

Defendant, Kevin Karl Wills, Jr., by and through undersigned counsel and pursuant to Fed. R. Crim. P. 45(b) and Local Rule 3.08 hereby moves this Honorable Court for a continuance of the plea hearing in this cause, presently set for Tuesday, November 19, 2024, at 2:00 p.m. In support thereof, Defendant states:

1. Defendant is charged by Information with Conspiracy to Defraud the United States. (Doc. 1).

2. The Government and Defendant have reached a plea agreement, which has been signed, and an Entry of Plea hearing has been scheduled for Tuesday, November 19, 2024 at 2:00 p.m. (Dkt. Entry 7).

3. Defendant's wife has tested positive for Covid-19 and Defendant is experiencing abdominal distress.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), undersigned counsel certifies that he has conferred with Assistant United States Attorney Arnold Corsmeier and is authorized to represent that the Government does not oppose the relief requested herein. In conferring with Mr. Corsmeier, he advises that he is available all day, Monday, November 25, 2024.

WHEREFORE, Defendant, Kevin Karl Wills, Jr., respectfully requests this Honorable Court enter its Order continuing the Entry of Plea hearing.

MEMORANDUM OF LAW

Fed. R. Crim. P. 45(b)(1)(A) provides in pertinent part: "When an act must or may be done within a specified period, the court on its own may extend the time, or for good cause may do so on a party's motion made: before the originally prescribed or previously extended time expires…."

Local Rule 3.08(a) provides: "[a] party must timely move for a continuance and explain in detail the reason a continuance is warranted and the effort to resolve any scheduling conflict." Good cause for the continuance is set forth above.

Respectfully submitted,

/s/ Elizabeth L. White
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished **Arnold B. Corsmeier, Esquire, Assistant United States Attorney**, chip.corsmeier@usdoj.gov, and **Jennifer Michele Harrington, Esquire, Assistant United States Attorney**, Jennifer.harrington2@usdoj.gov, via the CM/ECF system, this 18th day of November, 2024.

/s/ Elizabeth L. White
ATTORNEY