UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v. CASE NO. 6:25-mj-01031-RMN

CAROLINA AMESTY

TIME-SENSITIVE JOINT MOTION FOR EXTENSION OF TIME BY WHICH INDICTMENT/INFORMATION MUST BE FILED

The parties, through their undersigned counsel, file this time-sensitive motion for an Order extending the time for the return of an indictment or information pursuant to 18 U.S.C. § 3161(b) through and including June 20, 2025. The parties believe that this extension would best serve the interests of justice and that the time would be excludable under 18 U.S.C. § 3161(h)(7)(A).

In compliance with Local Rule 3.01(e), the parties request a ruling on this motion by Friday, April 18, 2025, as the current indictment deadline is Monday, April 21, 2025. Doc. 12.

On January 16, 2025, the defendant was charged by criminal complaint for violations of 18 U.S.C. § 641 (theft of government property). Doc. 1. On January 30, 2025, the defendant executed a waiver of the speedy indictment or information period. Doc. 11-1. On February 3, 2025, the parties filed a joint motion to extend time to file an indictment or information, which the Court granted on February 5, 2025. Doc. 11; Doc. 12. The Court found that the time from January 21, 2025, through April 21, 2025, was tolled under 18 U.S.C. § 3161(b) and (h)(7). Doc. 12.

The Court further ordered that, "[a]bsent a further order, the United States shall return the indictment or information in this matter on or before April 21, 2025." *Id.*

The initial appearance was held on February 18, 2025. Doc. 13. Then, on April 15, 2025, the defendant executed a second waiver of the speedy indictment or information period, though June 20, 2025. *See* Exhibit 1.

Counsel for the United States and the defendant currently are engaged in active discussions regarding the appropriate disposition of this matter and believe that a continuance would serve the ends of justice by providing the parties with reasonable time for such discussions, for adequate preparation for pretrial proceedings, and for effective preparation, taking into account the exercise of diligence. Based upon this information, the interests of justice would be served by the parties continuing to attempt to resolve this matter prior to grand jury presentment, indictment, and/or trial.

The defendant has been apprised of the constraints of 18 U.S.C. § 3161 *et. seq.* as it relates to her case and, voluntarily and with full knowledge of the consequences, hereby waives any time from tolling on her right to a speedy indictment or trial through June 20, 2025.

For these reasons, the parties request that the Court grant this Motion and extend the time within which an indictment or information may be filed in this case through June 20, 2025. If the Court grants this Motion, the parties request that the Court find in its Order that the ends of justice served by taking such action outweigh the best interests of the public and the defendant in a speedy indictment and trial, to

provide the parties with an opportunity to engage in discussions regarding the disposition of the matter, and to provide the parties with reasonable time for adequate preparation for pretrial proceedings and for effective preparation, taking into account the exercise of diligence.

Subject to the outcome of the parties' discussions, the government will file an indictment or information with the Court on or before that date.

Respectfully submitted,

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