UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v. CASE NO. 6:22-cr-00201-WWB-LHP

JOSHUA EDWARDS

JOINT MOTION TO CONTINUE TRIAL

The United States of America, by Gregory W. Kehoe, United States Attorney for the Middle District of Florida, and counsel for the defendant, Attorneys Andrew Searle and Corey Cohen request, pursuant to Fed. R. Crim. P. 12(b), that this Court continue the trial in this case now set for the January 2026 trial term, and in support of its motion states as follows:

1. On December 7, 2022, the defendant was charged by grand jury indictment with one count of conspiracy to commit bank fraud, one count of bank fraud, one count of making a false statement to a lending institution, and one count of visa fraud. Doc. 1.

2. The indictment alleges, among other things, that the defendant submitted a materially false Paycheck Protection Program loan application on behalf of ASLAN International Ministry, Inc. to First Home Bank. The indictment further alleges that, as a result of such application, the defendant and his co-conspirator(s) fraudulently received funds over $8,000,000, which were later seized by the United States.

3. From the time of the defendant's initial appearance in December 2022 through March 2025, competency proceedings for the defendant were ongoing, ultimately resulting in the defendant's restoration to competency. *See* Docs. 9, 14, 70, 72, 94, 97, 121, 123, 201, 209, 213, 242, 251.

4. On October 14, 2025, the United States offered the defendant a plea agreement, as the defendant recently expressed a desire to resolve the case without proceeding to trial. The defendant has not signed the plea agreement and plea negotiations have recently ceased.

5. The trial is currently set for the January 2026 trial term. As set forth below, the parties respectfully request that the trial in this case be moved to the February 2026 trial term, unless the Court has availability to set the trial for the last week in January 2026.

MEMORANDUM OF LAW

The parties agree that the ends of justice in continuing the trial to the January 2026 trial term would outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). Factors which the court must consider include whether the failure to grant the continuance would be likely to result in a miscarriage of justice, whether the case is so complex that it is unreasonable to expect adequate preparation for trial within the time limits established by the speedy trial statute, and whether failure to grant the continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account

the exercise of due diligence. 18 U.S.C. § 3161(h)(B)(1), (ii), (iv).

Here, recent efforts by both parties have been in attempting to reach a resolution without the need for a trial. However, those efforts have not succeeded. Given the complexity of the case and the needs of this defendant, both parties need additional time to prepare for trial. Especially in light of the intervening holidays, locating and preparing witnesses for trial, some of whom reside out of the country, is a challenge. Additionally, defense counsel needs sufficient time to prepare the defendant for a trial. Thus, unless the Court has availability to try the case during the last week of January, the parties respectfully request that it be continued to the February trial term.

In view of the above circumstances, the parties respectfully request this Court continue the case for trial to the February 2026 trial term.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Andrew Searle, Esq.
Corey Cohen, Esq.

By: /s/ Kara M. Wick

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