UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v. **Case No. 3:24-cr-179-WWB-LLL**

CRYSTAL DENEAN HARVELL

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

The Defendant, **Crystal Denean Harvell**, pursuant to Local Rule 3.09, Middle District of Florida, requests this Court to continue the Sentencing Hearing presently scheduled for December 6, 2024 at 1:30 P.M. and as grounds, states the following:

1. The Office of the Federal Defender was appointed to represent Ms. Harvell at her Initial Appearance, which also served as a Change of Plea Hearing (Doc. 14). This Court's Acceptance of Plea was entered on September 12, 2024 scheduling Ms. Harvell's sentencing hearing for December 6, 2024 at 1:30 P.M. (Doc. 18). Prior to the Office of the Federal Defender being appointed, Ms. Harvell had been represented by private counsel. As such, undersigned counsel has only been working with Ms. Harvell since September 12, 2024.

2. Undersigned counsel and Ms. Harvell have met several times to discuss Ms. Harvell's case and have begun working on gathering materials that they would like to present at the Sentencing Hearing. The Office of the Federal Defender has ordered records from multiple facilities, and while some of the requested records

of been obtained, there are still at least three (3) facilities that have not yet responded to the records request.

3. In addition to undersigned counsel's mitigation efforts, Ms. Harvell has recently met with the government to fulfill her obligations under the Plea Agreement. It is likely that Ms. Harvell will need to have additional meetings for that purpose and would like to conduct those meetings prior to her sentencing.

4. Wherefore, Ms. Harvell requests a continuance of the sentencing hearing for ninety (90) days in order to work on these matters.

5. Undersigned counsel has contacted Assistant United States Attorney Kevin Frein and he has no objections.

6. This motion is made in good faith and not for the purpose of unduly delaying the proceedings.

WHEREFORE, the Defendant requests that the Court continue the hearing presently scheduled and set the hearing 90 days from the scheduled matter.

MEMORANDUM OF LAW

Local Rule 3.09, Middle District of Florida, provides that a continuance may be allowed by Order of the Court for good cause shown. The defendant suggests the foregoing constitutes good cause for the requested continuance.

Respectfully submitted,

A. FITZGERALD HALL, ESQ.
FEDERAL DEFENDER, MDFL

s/ Sabra M. Barnett

Sabra M. Barnett, Esq.
Florida Bar No. 1058792
Assistant Federal Defender
200 West Forsyth Street, Suite 1240
Jacksonville, FL 32202
Telephone: (904) 232-3039
Fax: (904) 232-1937
Email: sabra_barnett@fd.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of October 2024, a true copy of the foregoing was served by electronic notification to Kevin Frein, Office of the United States Attorney.

s/ Sabra M. Barnett
Sabra M. Barnett, Esq.