

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

2019 AUG -2 PM 4:29

CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE FLORIDA

UNITED STATES OF AMERICA,

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Docket No:

3:18-cr-89-J-34 JRK

v.

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KATRINA BROWN and
REGINALD BROWN

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AUGUST 2, 2019

DEFENDANT'S MOTION TO CONTINUE TRIAL AND PRETRIAL MOTIONS DATES

Pro Se Defendant Katrina Brown, respectfully move this Honorable Court to continue the trial date in the above-captioned case from August 19, 2019, with a new pretrial motions deadline set accordingly for six months in order to prepare for trial.

Pro Se Defendant believes under 18 U.S.C. & 3161(H)(7), the court will find a continuance outweighs the best interest of the public.

This motion is opposed by the government-as represented by Assistant United States Attorney Tysen Duva.

As grounds for this motion, Pro Se Defendant states as follows:

1. Katrina Brown is charged with others, known and unknown, with conspiring to commit mail and wire fraud in violation of 18 U.S.C. § 1349. Katrina Brown is charged in 13 counts of mail fraud in violation of 18 U.S.C. § 1343 and 2.

Katrina Brown is charged in 13 counts of wire fraud in violation of U.S.C. § 1343 and 2. Counts 28 and 33 charge money laundering offenses in violation of 18 U.S.C. § 1957 and 2. Katrina Brown is charged individually with attempted bank fraud in counts 34 and 35. Ms. Brown is also charged individually with making false statements to a federally insured institution in Counts 36 and 37.

2. The additional time requested between the current trial date of August 19, 2019, and the new trial is necessary to provide Pro Se Defendant Katrina Brown reasonable time to prepare her defense against the 37-count indictment charges.

3. Pro Se Defendant will require additional time beyond the current trial date of August 19, 2019, to review the voluminous discovery and investigate all factual allegations, locate and interview witnesses, conduct legal research and prepare and file pretrial motions, and prepare for trial.

For these reasons, the defense request that the court find:

(a) taking into account the exercise of due diligence, a failure to grant a continuance would deny Pro Se Defendant the reasonable time necessary for effective preparation, due to time needed to review evidence, consider possible defenses, and gather evidence material to the defense, as set forth in 18 U.S.C.

& 3161 and

(b) A failure to grant a continuance would likely result in a miscarriage of justice as set forth in 18 U.S.C. & 3161

(c) The government has produced discovery that will require additional time to review and conduct follow up investigation.

(d) The ends of justice will best be served by a continuance, and the ends of justice outweigh the best interest of the public and the defendant(s) in a speedy trial, as set forth in 18 U.S.C. & 3161

MEMORANDUM OF LAW

18 U.S.C. & 3161 permits this court to continue a trial beyond the speedy trial period if the “ends of justice served by taking such action outweigh the best interest of the public in a speedy trial”

Pro Se Defendant Katrina Brown submit an extension serves the ends of justice.

WHEREFORE, Pro Se Defendant Katrina Brown, respectfully request that this Honorable Court grant this motion.

Respectfully submitted,

s/Katrina Brown
Pro Se Defendant Katrina Brown
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CERTIFICATION

I hereby certify that on August 2, 2019, I filled the foregoing Pro Se Defendant Motion to Continue Trial and PreTrial Motions Due Date with the Clerk of the Court in person and will deliver a copy to the Assistant United States Attorney Tysen Duva

s/Katrina Brown
Pro Se Defendant Katrina Brown