

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

vs.

CASE NO. 3:16-cr-000048-J-34JBT

REGINALD FULLWOOD
a/k/a Reggie Fullwood

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW the Defendant, **REGGIE FULLWOOD**, by and through his undersigned attorney to move this Honorable Court for its Order Continuing the Trial of this cause currently scheduled to commence in the June term. In further elaboration and support hereof, the Defendant would show unto the Court as follows:

1. The Defendant had his first appearance on April 15, 2016 and the case was set for Trial in the June Term.
2. The interval allowed is insufficient to reasonably prepare for Trial. There was a brief but unavoidable delay in the production of Discovery and the Discovery has proved to be relatively voluminous. Also, the Defendant anticipates filing motions to dismiss addressing Counts 1 through 10 of the Indictment and at least one other motion preliminary to those motions to dismiss.

3. From all of the foregoing, it is respectfully submitted that the Defendant reasonably requires additional time before Trial. Specifically, he seeks a continuance of the currently scheduled Trial date to or after the August, 2016, Trial Term.

4. Undersigned counsel has been authorized to represent that the Government (AUSA Devereaux) does not oppose the relief sought by this Motion.

RESPECTFULLY SUBMITTED this 5th day of May, 2016.

Robert Stuart Willis
ROBERT STUART WILLIS
Florida Bar No. 153152
Attorney for Defendant
Willis, Ferebee & Hutton
503 East Monroe Street
Jacksonville, Florida 32202
Telephone: (904) 356-0990
Fax: (904) 353-2756
E-mail: rwillislaw@aol.com

I CERTIFY that on May 5, 2016, 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 United States Attorney's Office, 300 North Hogan Street, Suite 7000, Jacksonville, Florida 32202.

s/ Robert Stuart Willis
ROBERT STUART WILLIS
Florida Bar No.: 153152
Attorney for Defendant
Willis, Ferebee & Hutton
503 East Monroe Street
Jacksonville, Florida 32202
Telephone: (904) 356-0990
Fax: (904) 353-2756
E-mail: rwillislaw@aol.com