

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Case No.: 8:21-CR-348-SCB-SPF**

**JEREMY BROWN**  
\_\_\_\_\_ /

**MOTION FOR EXTENSION OF TIME TO RESPOND TO**  
**ORDER TO SHOW CAUSE**

COMES NOW, the Defendant, JEREMY BROWN, and moves this Honorable Court for an extension of time in which to respond to the Court's Order to Show Cause. Doc. 100. In support of this motion, Defendant states the following:

1. On February 2, 2022, this Court issued an order show cause as to why Mr. Brown should not be held in contempt for failing to comply with this Court's order directing him to deposit funds in Court's registry. Doc. 100.
2. Undersigned counsel was involved in an armed kidnapping jury trial from January 31 – February 4, 2022 in Citrus County, Florida. Undersigned counsel's client faced mandatory life in prison if convicted. The case was vehemently litigated.
3. Undersigned counsel briefly saw this Court's Endorsed Order, but somehow missed the response due by February 4, 2022.

4. The jury in the armed kidnapping case did not get the case until late afternoon on February 4, 2022. The defendant was convicted and will be sentenced to mandatory life in prison.
5. Undersigned counsel was then dealing with the defendant's family after the devastating verdict, whom counsel has developed a close relationship with over the years of litigation.
6. It was not until February 6, 2022 that counsel realized that the Court ordered a response by February 4, 2022.
7. To date, undersigned counsel has not even spoken with Mr. Brown about the Order to Show Cause.
8. Undersigned counsel apologizes for this oversight that occurred during the week spent in jury trial.

WHEREFORE, for the reasons stated herein, Defendant respectfully requests that this Honorable Court enter an order allowing an extension of time to respond to the Order to Show Cause.

I HEREBY CERTIFY that a copy of the foregoing motion has been furnished by electronic filing using the CM/ECF system to Risha Asokan, United States Attorney's Office, this 6th day of February, 2022.

Respectfully submitted,

s/William Sansone  
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