

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No: 21-cr-00348-SCB

JEREMY BROWN

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DEFENSE'S MOTION FOR EXTENSION OF TIME TO FILE  
NOTICE PURSUANT TO CIPA SECTION 5

COMES NOW, the Defendant, Jeremy Brown, by and through undersigned counsel, hereby respectfully requests this Honorable Court for permission to file the CIPA Section 5 Notice by no later than October 21, 2022.

For many reasons, the Defense respectfully requests additional time to prepare and file its CIPA Section 5 Notice. This Honorable Court had indicated in its Amended Pre-Trial Order that this document shall be filed by October 7, 2022. The Defense apologizes to this Honorable Court for not filing this request for an extension by October 7, 2022. Both Defense counsel, along with the Defendant, went to view the classified information on October 5, 2022 and after further discussions, the Defense is requesting additional time to prepare the CIPA Section 5 Notice. The Defense is aware

that Attorney Marcet, representing the Government, was out of the country Wednesday through Friday last week. The Defense has a good faith belief, based on prior discussions, that Mr. Marcet would not object to this requested extension of time. However, the Defense does not specifically know Mr. Marcet's position on this request as the Defense has not yet reached him via telephone or email.

**WHEREFORE**, the Defense respectfully submits this Motion for Extension of Time to file the CIPA Section 5 Notice.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished to the Clerk of Court for e-filing and service on all interested parties on this 10<sup>th</sup> day of October, 2022.

Respectfully submitted,

*/s/ Melissa A. Loesch*

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Melissa A. Loesch  
Fla. Bar No. 0884251  
**For the Law Offices of Roger Futerman  
& Associates**  
13620 49<sup>th</sup> Street North, Suite 201  
Clearwater, Florida 33762  
(727) 344-5511  
futermanlaw@yahoo.com