

**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 TO CONTINUE**

COMES NOW, the Defendant, JEREMY BROWN, and moves this Honorable Court for a continuance of the evidentiary hearing on the order to show cause scheduled for Friday, March 25, 2022 at 10:00a.m. As grounds for this motion, undersigned counsel states the following:

1. On March 24, 2022, Mr. Brown informed undersigned counsel that private counsel was being hired to take over the case and Mr. Brown does not want undersigned counsel's legal representation on any further matters.
2. Mr. Brown instructed counsel to withdraw. Counsel filed a motion to withdraw. (Doc. 128).
3. The Court denied the motion without prejudice. (Doc. 129).
4. The evidentiary hearing on the order to show is scheduled for tomorrow, Friday March 25, 2022 at 10:00a.m.

Undersigned counsel moves to continue the evidentiary hearing to allow Mr. Brown to have his private counsel represent him at the hearing. Mr. Brown has effectively fired undersigned counsel, and does not want him to conduct the hearing or make legal arguments on his behalf. Therefore, undersigned counsel asks the Court for a short continuance to allow Mr. Brown's new counsel to file a notice of appearance and be present at the evidentiary hearing.

Undersigned counsel has assured Mr. Brown, and will assure the Court, that the change in counsel will be seamless. Undersigned counsel will make sure that private counsel is brought up to speed on all issues as quickly as possible.

The United States objects to a continuance. The government's position is as follow:

The United States opposes the defendant's request to continue the evidentiary hearing. This hearing previously was continued from March 1, 2022, to March 25, 2022, for the reasons set forth in the United States' unopposed motion for a continuance (Doc. 115). Since then, the United States diligently has pursued its subpoenas to the relevant persons and entities and assembled evidence for the Court's consideration. Three witnesses have been subpoenaed to testify at the hearing as scheduled, including one witness who has traveled from out of state on two occasions to be present at the hearing. The Court and counsel have set aside time

tomorrow to address this matter that has been pending since January. The defendant's decision to retain counsel on the eve of the hearing does not amount to good cause to delay the proceedings even further. The United States respectfully requests that the Court proceed with the hearing as scheduled on March 25, 2022.

While counsel understands the government's position, a short continuance will not prejudice the government. If the hearing goes forward as scheduled, undersigned counsel will be in the untenable position of having to represent Mr. Brown after having effectively been fired.

Accordingly, based on the foregoing, Mr. Brown moves this Court for an order granting a short continuance for Mr. Brown to have his new counsel file a notice of appearance and represent him at the show cause hearing.

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 24th day of March, 2022.

Respectfully submitted,

s/William Sansone  
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