

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

UNITED STATES OF AMERICA

V.

NO. 3:20-cr-00037 CWR-FKB-3

DAVID B. HUNT

**UNOPPOSED MOTION TO CONTINUE TRIAL
AND EXTEND PRE-TRIAL DEADLINES**

Defendant David B. Hunt (“Hunt”) respectfully moves the Court to continue the trial in this case, and as grounds therefore states the following:

1. The Defendant has been accused of participating in a conspiracy to defraud the State of Mississippi, the United States and others, regarding contracts executed by the Mississippi Department of Education in 2014 and 2015. The Defendant is in the process of preparing a full defense to these allegations, including the gathering of documentary and testimonial proof to rebut these allegations.

2. Pursuant to the Court’s September 10, 2020 Order, the trial of this case is set for November 2, 2020. The deadline for filing non-dispositive motions is October 2, 2020 and the deadline for filing dispositive motions is October 13, 2020.

3. A continuance is necessary to allow Hunt sufficient time to prepare his defense and to address all factual and legal issues that pertain to the government’s allegations against him.

4. Due to the existing deadlines in this case, the Defendant would be substantially disadvantaged, should this Motion not be granted. Moreover, this Motion is not interposed for the purpose of delay but is in the interest of justice, takes into account there are multiple defendants in

this case, the nature of the government's allegations, and the existence of novel questions of fact and law. Failure to grant the continuance would result in a miscarriage of justice.

5. Hunt's counsel has conferred with government counsel, Ted Cooperstein, and the United States does not oppose this motion.

6. Hunt acknowledges his rights under the Speedy Trial Act and waives the time period covered by this continuance, if granted.

7. Accordingly, Defendant Hunt requests that this Court continue the trial of this case from the present setting. The Defendant further requests that the Court extend all pre-trial deadlines to correspond to the new trial date.

WHEREFORE, Defendant David B. Hunt respectfully requests that the Court enter an Order continuing the trial of this matter and re-setting it for a future trial setting. Further, the Defendant requests that all pre-trial deadlines be extended in accordance with the new trial date.

This the 2nd day of October, 2020.

Respectfully submitted,

DAVID B. HUNT

By His Attorneys,
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

By: Michael T. Dawkins
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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2020, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all parties.

Michael T. Dawkins
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