

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-CR-20005-GAYLES

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALBERICO AHIAS CRESPO,

Defendant.

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JOINT MOTION TO CONTINUE TRIAL DATE

The defendant, Alberico Ahias Crespo, together with the Government, hereby file this Joint Motion to Continue Trial Date, and in support thereof states as follows.

1. This case was previously set for trial on July 18, 2022.
2. At a telephonic status conference on July 7, 2022, the parties and the Court agreed to reset the case due to the Court's current trial setting in Key West.
3. The parties conferred on July 12, 2022 to discuss a future trial date.
4. AUSA Sean McLaughlin's wife and daughter have tested positive for COVID-19 and Mr. McLaughlin stated that he is also sick.
5. Mr. Seitles currently has several upcoming multi-week trials scheduled: August 29, 2022 (*United States v. Lawrence Alexander*, SDFL Case No. 21-CR-60253-KMM); September 12, 2022 (*United States v. Stephen Costa*, SDFL Case No. 19-CR-20674-DPG), September 27, 2022 (*United States v. Fidalgis Font*, SDFL Case No. 21-CR-20106-RNS), and October 3, 2022 (*United States v. Jonathan Bauer*, EDTX Case No. 4:22-CR-25-SDJ-KPJ), and October 24, 2022 (*United States v. Elizabeth Hernandez*, SDFL Case No. 22-CR-20152-KMM).

6. Mr. Quinon also has several upcoming trials scheduled, some of which will last several weeks: September 12, 2022 (*State v. Frank Artiles*, F21-004768); October 11, 2022 (*United States v. Michael Ligotti*, Case No. 20-CR-80092); and October 31, 2022 (*State v. Octavio Oliu*, F15-4058).

7. Because of these conflicts, the parties jointly agreed to a special setting in this case of December 5, 2022.

WHEREFORE, based on the foregoing, the parties jointly request this Honorable Court set this case for trial on December 5, 2022.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I CERTIFY that on July 12, 2022, undersigned filed the foregoing document using CM/ECF which will serve all counsel of record.

/s/ Marc David Seitles
Marc David Seitles, Esq.