

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20326-CR-KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE LORQUET

Defendant.

_____/

MOTION TO CONTINUE RESTITUTION HEARING

Defendant, Andre Lorquet, moves the Court to continue the restitution hearing of May 23, 2024.

The Court scheduled a restitution for May 23, 2024. Although the undersigned and counsel for the government have reached an agreement in principle over the amount of restitution based on the declaration of victim losses and Mr. Lorquet's position on certain amounts sought or stated in the declaration with which he disagreed, Mr. Lorquet was moved from FDC-Miami while the parties were still discussing the matter and before the undersigned could meet with Mr. Lorquet to confirm whether he would accept the government's most recent proposal to settle the restitution amount and avoid a hearing through a stipulation. Being that there was a scheduled hearing and thus far the parties had failed to reach an agreement, the undersigned was surprised to learn that Mr. Lorquet was transferred out of FDC-Miami with a pending hearing scheduled on the Court's

docket. In short, we do not have a stipulation that the undersigned has verified with Mr. Lorquet that he will, in fact, accept it, and, therefore, the undersigned has likewise not secured Mr. Lorquet's waiver of appearance on May 24, 2024.

Through this motion, we are asking that the Court to continue the restitution hearing to provide the undersigned time to speak Mr. Lorquet who is now at FCI-Tallahassee and ascertain whether he will accept the government's most recent proposal and / or waive his appearance. The undersigned called FCI-Tallahassee to ascertain how we could schedule some sort of attorney client telephone call and we have written to Mr. Lorquet via Corrilinks. But no one answers the phone at FCI-Tallahassee and Mr. Lorquet has not replied to the Corrilinks email.

WHEREFORE, Mr. Lorquet respectfully requests that the Court continue the restitution hearing for 30 days.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on May 23, 2024, a true and correct copy of the foregoing has been furnished electronically via CMCEF to all counsel of record.

Respectfully submitted,

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