

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 ALEXANDRA ACOSTA,)
)
 Defendant.)
 _____)

CASE NO. 23-cr-60170-RNS

AGREED MOTION TO CONTINUE TRIAL AND CALENDAR CALL

COMES NOW, the Defendant, ALEXANDRA ACOSTA (“Acosta”), by and through the undersigned attorney, and motions this Court to continue her presently scheduled calendar call and trial by ninety (90) days. In support thereof, Acosta states as follows:

1. Prior to filing the instant motion, the undersigned communicated with AUSA Trevor Jones (the prosecutor assigned to the instant matter) who advised the government has no objection to granting the instant motion. The instant motion is Acosta’s first motion for continuance of calendar call and trial.

2. On October 19, 2023 Acosta was arraigned. On October 25, 2023, the government disclosed its first discovery submission. Calendar call is presently set for November 28, 2023 and trial is set for December 4, 2023.

3. The parties agree to a ninety (90) extension of time so that the Defense may complete discovery. Specifically, the undersigned is in the process of issuing multiple subpoenas to produce documents and records on third parties who the undersigned believes may possess exculpatory evidence that is material to Acosta's defense.

4. Additionally, the undersigned attorney has been ordered to appear for jury duty in this district on December 4, 2023 and is therefore unavailable for trial.

WHEREFORE, the Defendant and the undersigned attorney respectfully motion this Court continue the presently scheduled calendar call and trial by ninety (90) days.

Respectfully Submitted,

/s/ Brian Silber

Brian Silber, Esq.

Counsel for Alexandra Acosta

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this document was served on the following parties via CM/ECF on November 17, 2023.

SERVICE LIST

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