

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

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

CASE NO. 23-cr-60170-RNS

ALEXANDRA ACOSTA,)

Defendant.)

UNOPPOSED MOTION TO CONTINUE

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 for a date after April 1, 2024. In support thereof, Acosta states as follows:

1. Prior to filing the instant motion, the undersigned communicated with AUSA Trevor Jones (“AUSA Jones”), the prosecutor assigned to the instant case, who advised the government has no objection to granting the instant motion.

2. On October 19, 2023 Acosta was arraigned. On October 25, 2023, the government disclosed its first discovery submission. On November 20, 2023, the

Court granted Acosta's first motion to continue. Calendar call is presently scheduled for **March 5, 2024** and trial is set for **March 11, 2024**.

3. The parties require a second continuance for two reasons: First, the undersigned attorney is getting married on March 10, 2024 and is unable to properly prepare for trial because trial in the instant case is scheduled for the next day, March 11, 2024. While the actual wedding is on March 10, the undersigned has family and friends coming in from out of town starting March 8, 2024. Family events will be taking place from March 8 through March 10. Aside from not having the time or state of mind to prepare for trial, the undersigned would *greatly* appreciate not having to start a trial the day after getting married.

4. Second, the parties are still engaging in discovery. For instance, the government recently received new documents in response to subpoenas it issued to third parties and those items are going to be disclosed to the Defense very soon but have not yet been disclosed. Documents from one of the third parties (a company named "Scratch") is expected to contain IP address information that the undersigned believes will be exculpatory and necessary for use at trial (for cross-examination of government witnesses and for admission during the Defense case).

5. The undersigned is available for trial in April and May with the exception of April 22, 2024 and April 23, 2024 due to Passover observance. AUSA Jones has advised that he is available for trial in both April and May.

WHEREFORE, the Defendant and the undersigned attorney respectfully motion this Court continue the presently scheduled calendar call and trial after April 1, 2024.

Respectfully Submitted,

/s/ Brian Silber

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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 February 28, 2024.

SERVICE LIST

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