

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20326-CR-KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE LORQUET

Defendant.

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO FILE A
RESPONSE TO THE GOVERNMENT'S OBJECTION TO MAGISTRATE
JUDGE LOUIS' REPORT AND RECOMMENDATION**

Defendant, Andre Loquet, through undersigned counsel, moves the Court for a seven-day extension of time to file his response to the government's objection to Magistrate Judge Louis' Report and Recommendation that the Court grant Mr. Lorquet's motion to withdraw his guilty plea. This motion is unopposed, as the government has no objection to the one-week extension of time sought through this motion.

On June 9, 2023, Magistrate Judge Louis entered an R&R that the Court grant Mr. Lorquet's motion withdraw his guilty plea. R&R, ECF 67. On June 22, 2023, the government filed an objection to the R&R, raising arguments, and citing evidence, that was not earlier raised. Objection, ECF 70. That evidence includes recordings of Mr. Lorquet's jail calls from FDC-Miami, which the government is in the process of producing for the undersigned and which we shall review with Mr. Lorquet. *See* ECF

70 (citing and quoting multiple jail calls). The government's recently produced index or file appendix (ECF 73) shows that it is producing 159 telephone calls, which, once received, we must copy to a disk once and mail to Mr. Lorquet at FDC. Mr. Lorquet's response to the R&R is due on July 6, 2023.

The undersigned will be out of the country, visiting our daughter in Guatemala where she works this summer, from Thursday July 29 through the 4th of July holiday.

Further, after meeting Mr. Lorquet for a second time, on July 24, 2023, the undersigned discovered that he does not appear to read or write competently, requiring the undersigned to spend more time than expected discussing matters, such as the government's objection to the R&R because the undersigned must read it to him aloud. The undersigned realized that Mr. Lorquet has difficulty reading and writing when he asked the undersigned what several words in the R&R were and how to pronounce them after the undersigned gave him the R& R and the government's objection to read. He did not appear to understand much of what he was reading.

The undersigned is also juggling multiple cases and client matters.

In sum, between juggling multiple client cases and matters, the above-mentioned trip, listening to, and reviewing with, Mr. Lorquet the recordings which the government cites, and the challenges in making sure that Mr. Lorquet understands key written materials, undersigned counsel needs additional time to respond to the Government's R&R.

Wherefore, the defendant, Andre Lorquet, requests an extension of time until July 13, 2023 to file a response to the government's objection to Magistrate Judge Louis' R&R.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 26, 2023, a true and correct copy of the foregoing has been furnished electronically via CMCEF to all counsel of record.

Respectfully submitted,

BELL ROSQUETE REYES ESTEBAN, PLLC

Henry P. Bell

Fla. Bar No. 090689

999 Ponce De Leon Blvd.

Suite 810

Coral Gables, Florida 33134

Telephone: (305) 570-1610

Facsimile: (305) 570-1599

Email: hbelle@bresq.com

Counsel to Andre Lorquet

By: s/Henry P. Bell
Henry P. Bel