

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO: 22-CR-20326-MOORE

UNITED STATES,

v.

ANDRE LORQUET,

Defendant.

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO THE DEFENDANT'S SECOND MOTION TO WITHDRAW PLEA**

The United States of America, by and through the undersigned Assistant United States Attorney, hereby files this Unopposed Motion for Extension of Time to Respond to the Defendant's Second Motion to Withdraw Plea [ECF No. 85], which was filed on September 18, 2023. The United States' response to the Motion is due Monday, October 2, 2023. *See* S.D. Fla. L.R. 7.1(c)(1). The United States' requests a 72-hour extension of time, until Thursday, October 5, 2023, to file a response to the Motion. The United States' requests this brief extension because the undersigned Assistant United States Attorney and Defense Counsel are undertaking good faith negotiations, up to and including today, to resolve the Defendant's Motion without the need for briefing or an evidentiary hearing. The Defendant is in custody at FDC and therefore cannot immediately respond to a negotiated resolution.

The undersigned Assistant United States Attorney has conferred with Defense Counsel, by telephone, and he does not oppose the United States' request.

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UNITED STATES ATTORNEY

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