

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 UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE A REPLY TO THE GOVERNMENT'S
RESPONSE TO MOTION TO WITHDRAW GUILTY PLEA**

Defendant, Andre Lorquet, through undersigned counsel, moves the Court for an extension of time until Tuesday, October 17, 2023 to file a reply to the government's response to his motion to withdraw his plea. This motion is unopposed.

The government filed a response to the Defendant's motion on October 5, 2023. Therefore, the defendant's reply memorandum is due October 12, 2023. However, the undersigned has been unable to visit with Mr. Lorquet at FDC to review the government's response and discuss a reply memorandum with him, because on October 6, 2023, the date on which the undersigned originally planned to meet with Mr. Lorquet, the undersigned was appointed to represent a client arrested in a material witness warrant, who, according to the government, was resisting appearing in court to testify at trial. He is the victim of a shooting. The undersigned was not on CJA duty, but agreed to be available when called by the Court, nevertheless. Having

to deal with that witness/client, including appearing in court on today's date with him, along with a previously scheduled deposition in another case, thwarted the undersigned from seeing Mr. Lorquet at FDC when initially planned to review the matter and file the reply. Hence, Mr. Lorquet hereby requests an extension of time to file the reply to provide his counsel with time to meet with him before filing a reply memorandum with the Court. The undersigned will see him on Saturday, October 14, 2023 and file the reply on or before October, 17, 2023, if the Court agrees.

The undersigned conferred with the government, which has no objection to the extension requested with this motion.

WHEREFORE, the Defendant, Andre Lorquet, requests an extension of time until October 17, 2023 to file a reply to the government's response to his motion to withdraw his guilty plea.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on October 12, 2023, a true and correct copy of the foregoing has been furnished electronically via CMC/EF to all counsel of record.

Respectfully submitted,

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