

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-20231-MIDDLEBROOKS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS VAZQUEZ,

Defendant.

_____ /

MOTION FOR CONTINUANCE

COMES NOW, undersigned counsel for Defendant CARLOS VAZQUEZ and files this, his Motion for Continuance and would furthermore state as follows:

1. This matter is set for trial on August 30, 2021, in the Miami Division of this Court.
2. On July 20, 2021, this Honorable Court granted Defendant's request to relieve his prior counsel. This occurred at the 2nd setting of a change of plea hearing.
3. On July 27, 2021, the undersigned filed his Notice of Appearance on behalf of Mr. Vazquez.
4. Since entering his appearance, the undersigned has been working furiously, reviewing pertinent documents and conferring with Mr. Vazquez. Unfortunately, Mr. Vazquez has been in ill health and was hospitalized the week after he appeared before this Honorable Court. Since his release from the hospital, he has experienced additional health related issues, which has interrupted the in person client conferences which had

been occurring between the undersigned and his client in order to be prepared for the August 30th setting.

5. The undersigned would respectfully be requesting a 3 week Continuance to allow for additional time for continued conversations and preparation of possible defenses to this matter. It is anticipated, even though this matter has been set twice before for a change of plea, that Mr. Vazquez will in all likelihood be resolving this case with a change of plea and not a trial.

6. The undersigned has conferred with Hayden P. O'Byrne, Assistant U.S. Attorney, who has no objection to the relief requested herein.

WHEREFORE, the undersigned respectfully requests that this Honorable Court grant the foregoing Motion.

Respectfully submitted,

By: /s/ Albert Z. Levin, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2021, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Albert Z. Levin, Esq.

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