

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-20231

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS VAZQUEZ,

Defendant.

**DEFENDANT VASQUEZS' EMERGENCY RENEWED MOTION FOR
CONTINUANCE**

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

1. Defendant Vazquez is scheduled for Sentencing on November 16, 2021 at 1:00p.m.

2. Defendant Vasquez was in the hospital for a week and was discharged on November 14, 2021. The undersigned has in his file a copy of the hospital discharge instructions. The Defendant was admitted with cardiomyopathy 45% and he is in declining health.

3. In addition, the Government is seeking sentencing enhancements which concern his Immigration status. The undersigned had scheduled a meeting with the prosecutor over a week ago to review the defendant's Immigration file, however, the meeting was cancelled by the prosecutor. The documents were reportedly made available for pickup this past Friday, however, the undersigned was unavailable to pick them up.

4. The undersigned is not seeking to delay this matter, however, does need additional time to review documents and speak to his client further with regard to the issues to be confronted at Sentencing. Also, the Defendant's health is in jeopardy.

5. The Government opposes this requested relief.

WHEREFORE, the undersigned would respectfully request that this Honorable Court grant the foregoing motion.

ALBERT Z. LEVIN, P.A.
Courthouse Center
40 N.W. 3rd Street, Suite 200
Miami, FL 33128
Tel: 305-379-7101
Fax: 305-381-6869
albert@albertlevinlaw.com

By: /s/ Albert Z. Levin, Esq.
Florida Bar No.: 316581

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 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.
Florida Bar No.: 316581

ALBERT Z. LEVIN, P.A.

Courthouse Center
40 N.W. 3rd Street, Suite 200
Miami, FL 33128
Tel: 305-379-7101
Fax: 305-381-6869
albert@albertlevinlaw.com