

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

UNITED STATES OF AMERICA

v.

Case No. 3:23-cr-48-TJC-LLL

CHRISTOPHER LEO DARAGJATI

UNOPPOSED MOTION TO CONTINUE SENTENCING

Defendant, Christopher Daragjati, by and through undersigned counsel, files this unopposed motion to continue the Sentencing Hearing currently set for October 26, 2023, and states the following:

1. On July 20, 2023, Mr. Daragjati entered a plea of guilty as to Counts One, Four, Eleven, Twelve, and Thirteen of the Indictment, pursuant to a plea agreement. This Court accepted the plea and set a Sentencing Hearing for October 26, 2023. On September 21, 2023, the Initial Presentence Investigation Report (“PSR”) was received by the parties. (Doc. 32).
2. Since that time, the parties reviewed the Initial PSR and undersigned counsel reviewed it with Mr. Daragjati. Given the nature of this case, the PSR contains information about intended and actual loss amounts attributable to Mr. Daragjati’s conduct. Mr. Daragjati questions some of these amounts. The accuracy of these amounts is essential for

determining restitution owed and will most likely affect the guidelines calculations under USSG § 2B1.1(b)(1).

3. The parties have been working diligently on verifying the exact loss amounts but have not been able to complete this work. There are over 2,000 pages of discovery, several law enforcement agencies, and various victims involved in this case. The parties therefore believe that more time is necessary before a Final PSR is filed and a Sentencing Hearing is held.
4. Undersigned counsel discussed the matter with AUSA Kevin Frein, Esq., and Probation Officer Joshua Blakely, and they do not oppose this request.
5. This Motion is not made for the purpose of unduly delaying the proceedings, but to provide Mr. Daragjati with full and fair representation, and to provide Probation Officer Blakely ample time to review and respond to any PSR objections filed by undersigned counsel.

THEREFORE, Mr. Daragjati requests that this Honorable Court continue the Sentencing Hearing in this case for a period of at least 30 days, on or after the week of November 27, 2023.

Dated: October 18, 2023

Respectfully submitted,

A. FITZGERALD HALL, ESQ.
Federal Defender, MDFL

s/ Scott T. Schmidt
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of October, 2023, a true copy of the foregoing was served by electronic notification to Assistant United States Attorney Kevin Frein, Esq., and to United States Probation Officer Joshua Blakely.

/s/ Scott Schmidt
Scott T. Schmidt, Esq.
Assistant Federal Defender