

**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

**SECOND UNOPPOSED MOTION TO
CONTINUE SENTENCING HEARING**

Defendant, **Christopher Daragjati**, pursuant to Local Rule 3.08, Middle District of Florida, requests this Court to continue the Sentencing Hearing scheduled for Wednesday, January 17, 2024, at 3:00 PM, and as grounds states the following:

1. On July 20, 2023, Mr. Daragjati entered pleas of guilty to Counts One, Four, Eleven, Twelve, and Thirteen of the Indictment, pursuant to a plea agreement. (Doc. 26). This Court accepted the plea and set a Sentencing Hearing for October 26, 2023. (Doc. 29). On October 19, 2023, this Court granted Mr. Daragjati's Unopposed Motion to Continue the Sentencing Hearing due the parties needing further time to prepare. (Doc. 34). The Sentencing Hearing was reset to January 17, 2024, at 3:00 PM.

2. Undersigned counsel is an expectant father and due to a recent change in medical circumstances, his daughter will be born earlier than originally anticipated. As a result, he will be on leave starting at the end of

December 2023, until early February 2024. Undersigned will then return to work for a period ending Friday, March 22, 2024. Starting on Monday, March 25, 2024, undersigned will begin an additional eight weeks of leave, with a planned return to work on Monday, May 20, 2024.

3. Undersigned respectfully requests that this Court continue the Sentencing Hearing to a date falling within the period that he returns to work after the first part of his leave. This Motion is made in good faith and not for the purpose of unduly delaying the proceedings.

4. Undersigned discussed this matter with Mr. Daragjati and provided him with a few options, including having another attorney handle the Sentencing Hearing. Mr. Daragjati would like undersigned to represent him at sentencing and consents to the Sentencing Hearing being delayed.

5. Undersigned discussed this matter with Assistant United States Attorney Kevin Frein, Esq., and he does not oppose a continuance of the Sentencing Hearing.

THEREFORE, undersigned counsel respectfully requests that this Court continue the Sentencing Hearing to a date **sometime between Monday, February 12, 2024, and Friday, March 22, 2024.**

MEMORANDUM OF LAW

Local Rule 3.08(a), Middle District of Florida, provides that a party must timely move for a continuance and explain in detail the reason a continuance is

warranted and the effort to resolve any scheduling conflict.

**A. FITZGERALD HALL, ESQ.
FEDERAL DEFENDER
MIDDLE DISTRICT OF FLORIDA**

Respectfully Submitted By:

A handwritten signature in black ink, appearing to read "Scott Schmidt", is written over a horizontal line.

Scott T. Schmidt, Esq.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that undersigned electronically filed the foregoing with the Clerk of Court and sent notice to Assistant U.S. Attorney Kevin Frein, Esq., and Probation Officer Joshua, this the 22nd day of December, 2023.

A handwritten signature in black ink, appearing to read "Scott Schmidt", is written over a horizontal line.

Assistant Federal Defender