

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

The United States of America, by Roger B. Handberg, United States Attorney for the Middle District of Florida files this unopposed motion to continue the sentencing hearing in this case, now set for March 13, 2024, and in support of its motion states as follows:

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, which has subsequently been rescheduled to January 17, 2024, and February 28, 2024.
2. The undersigned now expects to be out of the state from March 8 – March 15, 2024, and seeks a short continuance of the sentencing hearing until the following week, if the Court is available, based on this recent development.
3. The undersigned discussed the matter with defense counsel, Scott T. Schmidt, Esq., and he does not oppose this request.

4. Assuming the motion is granted the parties recognize that the Court will decide a new sentencing date and time. To the extent the Court is available the undersigned and Mr. Schmidt discussed proposed dates and times both parties are available for a rescheduled sentencing hearing. In an effort to resolve potential scheduling conflicts and make the continuance as short as practicable, those dates and times are listed below:

Monday, March 18th, 2024, any time before 12:00;

Tuesday, March 19th, any time after 1:00; and

Wednesday, March 20th, any time after 3:00.

5. This motion is not made for the purpose of unduly delaying the sentencing proceeding. Local Rule 3.08 provides that a party may move for a continuance by explaining the reason a continuance is warranted.

WHEREFORE, the United States requests that the Court grant a short continuance of the sentencing hearing scheduled for March 13, 2024.

Respectfully submitted,

ROGER B. HANDBERG
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Scott T. Schmidt, Esquire.

/s/ Kevin C. Frein
KEVIN C. FREIN
Assistant United States Attorney