UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 21-6149-MJ-HUNT

UNITED STATES OF AMERICA,

Plaintiff,

v.

CINDI ELLIS DENTON,

Defendant.

_____/

UNOPPOSED MOTION FOR EXTENSION OF ARRAIGNMENT

The United States of America, through the undersigned Assistant United States Attorney, respectfully moves the Court for entry of an order extending the date of arraignment by thirty (30) days and in further support states:

1. The Defendant in this matter is charged in a complaint with wire fraud, bank fraud, and conspiracy to commit bank fraud and wire fraud (D.E. 1).

2. The matter is set for an arraignment on May 21, 2021. (D.E. 11). The Parties are currently working on a resolution of this case, but respectfully request an extension of the arraignment date by thirty (30) days.

3. On April 6, 2021, Chief Judge K. Michael Moore issued an administrative order concerning the global COVID-19 pandemic. (*See* 9th Order Concerning Jury Trials available at:

https://web.flsd.uscourts.gov/uploads/adminOrders/2021/2021-33.pdf). This Administrative Order continued all jury trials in the Southern District of Florida to July 6, 2021, and continued all trial related deadlines. (*Id.* at ¶¶ 6–7).

4. The Administrative Order continued these deadlines in accordance with the Speedy Trial Act (18 U.S.C. § 3161(h)(7)(A)) and excluded all time from March 30, 2020 until July 6, 2021, finding that the "ends of justice [are] served by taking that action outweigh the interests of the parties and the public in a speedy trial." (*Id.* at ¶ 10).

5. The Parties are diligently working to resolve this matter and expect to do so within the next thirty days. This case stems from an investigation into a $35 million conspiracy involving more than 30 participants and is being investigated by both the United States Attorney's Office for the Southern District of Florida and the Department of Justice in Washington, D.C. Accordingly, a resolution has required input from multiple offices and attorneys, and a review of a significant amount of data and evidence.

6. The United States has conferred with counsel for the Defense. Counsel for the Defense does not oppose this request.

Dated: May 12, 2021

Respectfully Submitted,

JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY

By:*/s/ Lindsey Lazopoulos Friedman*
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CERTIFICATE OF SERVICE

I HEREBY certify that on May 12, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF.

By: s/*Lindsey Lazopoulos Friedman*
Lindsey Lazopoulos Friedman
Assistant United States Attorney