UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 21-6149-HUNT

UNITED STATES OF AMERICA
Plaintiff,
vs.

CINDI ELLIS DENTON,
Defendant.
_____/

JOINT MOTION TO CONTINUE
THE PRELIMINARY HEARING AND THE ARRAIGNMENT

The parties, through undersigned counsel, file this Joint Motion to Continue the Preliminary Hearing and Arraignment in this matter. The parties request that these matters be continued until May 21, 2021, and as grounds state:

1. Ms. Denton is charged by Criminal Complaint with Wire Fraud, in violation of 18 U.S.C. §§ 1343 and 2, Bank Fraud, in violation of 18 U.S.C. §§ 1344 and 2, and conspiracy/attempt to commit wire fraud/bank fraud, in violation of 18 U.S.C. § 1349. [ECF No. 1] She is scheduled to appear on April 21, 2021, for her preliminary hearing and arraignment. [ECF No. 7]
2. Ms. Denton, who resides in California, is currently released on a $26,000 personal surety bond, with the conditions of bond as where set in the Central District of California. [ECF No. 7-8]
3. Due to the unavailability of Grand Juries caused by the COVID-19 pandemic, the government is unable to seek an Indictment at this time. On April 6, 2021, Chief Judge Moore ordered that "[jury] trials in the Southern District of

Florida, … are continued until July 6, 2021." Administrative Order 2021-33, Ninth Order Concerning Jury Trials and Other Proceedings. The Chief Judge further ordered that the period of any continuance during this time shall be excluded under the Speedy Trial Act until July 6, 2021. Two grand juries per week commenced on November 16, 2020. Id. Furthermore, the parties are in negotiation to proceed by Information and the execution of a Waiver of Indictment.

4. Ms. Denton, through counsel, acknowledges that she has discussed with counsel her right to a timely preliminary hearing or examination of probable cause. Counsel acknowledges that Ms. Denton waives her right to a preliminary hearing through May 21, 2021.

5. Due to the ongoing pandemic, and in light of the Chief Judge's Order, the government's inability to present this case to a Grand Jury, and the parties ongoing negotiations, the parties request that the preliminary hearing and arraignment be continued until May 21, 2021.

6. Counsel for the government, Assistant United States Attorney Lindsey Friedman, joins in this motion. The parties agree that the ends of justice served by continuing this matter outweigh the interests of the parties and the public in a speedy trial.

Respectfully submitted,

MANUEL GONZALEZ, JR., ESQ.

By: ***/s/ Manuel Gonzalez, Jr.***
Florida Bar No.: 0397997

121 Alhambra Plaza, Suite 1500
Coral Gables, Florida 33134
Tel: (305) 444-1400
Fax: (305) 938-5009
E-mail: mannylaw7@yahoo.com

CERTIFICATE OF SERVICE

I HEREBY certify that on **April 20, 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 via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ ***Manuel Gonzalez, Jr.***