

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**UNITED STATES,  
Plaintiff,**

**v.**

**Case No. 1:23-cr-20036-KMM**

**DANIELA RENDON,  
Defendant.**

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**DEFENDANT'S EMERGENCY MOTION TO CONTINUE**

**COMES NOW** the Defendant, Daniela Rendon, by and through the undersigned Attorney, and submits this unopposed motion to continue the sentencing currently scheduled for February 9, 2023. A memorandum of law is not required to be filed with this motion pursuant to S. D. Fla. L. Rule 7.1 (a) (1) (G). In support of this motion Defendant states as follows:

1. On January 26, 2023, the Defendant was indicted charging her with violations of :

Count: 1-7 Citation: 18:1343.F Offense Level: 4 WIRE FRAUD/18:1343.F

Count: 10 Citation: 18:1028A.F Offense Level: 4 AGGRAVATED

IDENTITY THEFT/18:1028A.F Count: 8-9 Citation: 18:1957-4700.F Offense

Level: 4 MONEY LAUNDERING/18:1957-4700.F.

2. Through the evening of February 8th and into the morning of

February 9th, 2023, the undersigned counsel was retained to represent this Defendant and has not had adequate time to contact parties involved and to make arrangements to be present.

3. Newly retained counsel is located in Orlando and is unable appear in person for the Hearing on Determination of Counsel by 10:00 a.m. and respectfully requests a continuance in this matter.

4. For the foregoing reasons, the Defendant respectfully requests that the Court grant this Motion to continue Hearing on Determination of Counsel currently scheduled for February 9, 2023.

Date: February 9, 2023

Respectfully Submitted,

/s/ Robert Mandell

**ROBERT I. MANDELL, ESQ.**

FBN: 15484

/s/ Asad Ali

**ASAD ALI, ESQ.**

**CO-COUNSEL**

FBN: 111887

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**CERTIFICATE OF SERVICE**

On February 9, 2023 via Conventional Filing, I filed the foregoing with the clerk of the court which will send notice to: US Attorney's Office, Southern District of Florida, 99 NE 4<sup>th</sup> Street, Miami, FL 33132.

/s/ Robert Mandell

**ROBERT I. MANDELL, ESQ.**

FBN: 15484

/s/ Asad Ali

**ASAD ALI, ESQ.**

**CO-COUNSEL**

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