

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

**UNITED STATES,
Plaintiff,**

v.

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

**DANIELA RENDON,
Defendant.**

_____ /

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Daniela Rendon, by and through the undersigned Counsel, and submits her unopposed motion to modify the conditions of her release prior to Sentencing, and as grounds therefore alleges as follows:

1. The Defendant just entered into a plea agreement in this case and anticipates being sentenced in the Court's due time.
2. The Defendant has several personal and business items that require her attention prior to sentencing and is thereroe requesting the following modification to the conditions of her release:
3. The Defendant's curfew shall be between the hours of 10:00 a.m. to 7:00 p.m.; electronic monitoring shall remain in effect.

4. The Defendant shall be permitted to travel from her home district in Miami-Dade County, Florida to Orlando, Florida, on for legal visits to her attorney's office.

5. The Defendant's counsel did ask her Probation Officer, Juan Lora, for Probation's position and he has stated that he had no objections on the curfew, or her travel to the Middle District of Florida for ATTORNEY VISITS ONLY.

6. On May 1, 2023, the undersigned conferred with Assistant United States Attorney, Jonathan Bailyn, who advised that he has no objection to the mentioned conditions of the Defendant's release.

For the foregoing reasons, the Defendant respectfully requests that the Court grant this Motion to modify the above-mentioned conditions of the Defendant's release.

DATED this 1st day of May, 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 May 1, 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 4th Street, Miami, FL 33132.

/s/ Robert Mandell
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/s/ Asad Ali
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