

**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 PERMIT TRAVEL

COMES NOW the Defendant, Daniela Rendon, by and through the undersigned Counsel, and submits her unopposed motion to permit travel for a limited purpose and timeframe, and as grounds therefore alleges as follows:

1. The Defendant requests to be permitted to travel to see her Attorney, Robert I. Mandell, Esq., for an in-office legal visit.
2. The Defendant requests to be permitted to travel from her home district in Miami-Dade County, Florida to Orlando, Florida, on July 21, 2023.
3. The Defendant will travel from Orlando, Florida and return back to Miami-Dade, Florida, on July 22, 2023, she anticipates a possible overnight visit in Orlando depending on traffic conditions.
4. On July 12, 2023, the undersigned conferred with Assistant United States Attorney, Jonathan Bailyn, who advised that he has no objection to permitting the Defendant to travel on these dates for said purposes.

5. On July 12, 2023, the undersigned's office spoke with Senior United State's Probation Officer, Juan F. Lora, who is the Defendant's Probation Officer, who stated he has no Objections to Ms. Rendon traveling to the United States Middel District of Florida, specifically Orlando, for legal visits with her attorney, Robert I. Mandell.

For the foregoing reasons, the Defendant respectfully requests that the Court grant this Motion to permit travel on the specific dates listed.

DATED this 12th day of July, 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 July 12, 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

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

CO-COUNSEL

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