

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

**UNITED STATES,
Plaintiff,**

v.

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

**DANIELA RENDON,
Defendant.**

_____ /

**DEFENDANT’S MOTION FOR 30 DAY EXTENSION
TO FILE AN APPEAL**

COMES NOW the undersigned Attorney, on behalf of Daniela Rendon and pursuant to this Court’s order, Document No. 68, and respectfully submit the Defendant’s request for a 30-day extension in which to file and/or request an Appeal in her matter.

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

Count: 1-7 Citation: 18:1343.F WIRE FRAUD/18:1343.F Count: 10

Citation: 18:1028A.F AGGRAVATED IDENTITY THEFT/18:1028A.F

Count: 8-9 Citation: 18:1957-4700.F MONEY

LAUNDERING/18:1957-4700.F.

2. On August 17, 2023, she was sentenced to 41 months as to Count

One, followed by three (3) years of supervised release with special conditions, restitution in the amount of \$198,990.00 and \$100.00 special assessment. Defendant's notice of right to appeal was given.

3. The undersigned's representation was complete upon sentencing, however, did file a motion for return of property on her behalf, DE 64 on August 21, 2023.

4. On August 28, 2023, Daniela Rendon filed a Pro Se Motion for Extension of Appeal, citing reasons of ineffective counsel due to the failure to correctly review discovery with her and that counsel failed to make objections to her PSR report as requested by Ms. Rendon. In addition, she claims counsel did not disclose his arguments presented at sentencing with her.

5. For the foregoing reasons, the Parties respectfully request the Court grant the Defendant's Motion for a 30-day extension in which to Appeal the matter.

Date: September 1, 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 September 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

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

CO-COUNSEL

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