

**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 APPEAR TELEPHONICALLY

COMES NOW the undersigned counsel, on behalf of Daniela Rendon, for the purposes of her Motion for 30 Day Extension to File and Appeal and for Appointment of Counsel to file an Appeal, and as grounds therefore alleges as follows:

1. The undersigned's representation ended upon the conclusion of the Sentencing Hearing on August 17, 2023.
2. The Defendant made additional requests to former counsel which was to provide power of attorneys for her and family members in addition request the additional passports and greencards of family memberws be returned.
3. The Defendant filed her pro se motion for Extension of time on August 29, 2023.

4. On September 1, 2023, the court struck the Defendant's motion and ordered the undersigned's office to file the motion on her behalf or adopt her motion.

5. The Court set the matter for hearing on September 7, 2023, for 10:00 a.m., and then updated the time to 11:30 a.m. as of September 5, 2023.

6. The undersigned's office did not anticipate or make allowances on his or the firm's calendar for an additional hearing in this case and consequentially his and his associates calendar is full of hearings on cases in central florida.

7. Due to the above stated reasons, the undersigned must respectfully request the Court to allow him to appear ***Telephonically***.

8. On September 5, 2023, the undersigned's office reached out to Assistant United States Attorney, Jonathan Bailyn, who states he has no objection to this motion.

For the foregoing reasons, the Defendant respectfully requests that the Court allow his appearance telephonically for the hearing scheduled September 7, 2023 at 11:30 a.m.

DATED this 6th day of September, 2023.

Respectfully submitted,

/s/ Robert Mandell

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

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CERTIFICATE OF SERVICE

On September 6, 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.

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