

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 22-CR-80157-AHS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DEREK JAMES ACREE,

Defendant.

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW, the Defendant, **DEREK JAMES ACREE**, by and through his undersigned counsel, and hereby respectfully submits the instant unopposed motion to continue sentencing of the Sentencing Hearing set for January 4, 2023 at 10:00 AM and as grounds therefore would state as follows:

1. The defendant is charged with conspiracy to commit wire fraud, 18 U.S.C. § 1349. A change of plea was heard before this Honorable Court on October 11, 2022.
2. The Government and the defense agree that a postponement of the sentencing for approximately 60 days will provide additional time to address ongoing matters of concern to all parties, including, but not limited to, the ongoing prosecution, and the satisfaction of financial matters important to both parties.
3. Mr. Acree is currently receiving mental health and substance abuse counselling and achieving excellent results.
4. This additional time will also provide the benefit of affording the Defendant the opportunity to address significant restitution/forfeiture demands.

5. Defense counsel has been in contact with Robin Waugh, AUSA who is in agreement with the requested continuance of 60 days or whatever the Court deems appropriate.

6. Defense counsel has spoken with his client about the instant request for a continuance, and Mr. Acree concurs with the request.

WHEREFORE, Defendant, **DEREK JAMES ACREE**, respectfully requests a continuance of the sentencing in this matter for a period of 60 days or for whatever period of time the Court deems appropriate.

I HEREBY CERTIFY that on December 20, 2022, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission generated by CM/ECF.

Respectfully submitted,

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