

**United States District Court
Middle District of Florida
Orlando Division**

United States of America,

Plaintiff,

v.

Case No: 6:21-cr-16-WWB-DCI

Don V. Cisternino,

Defendant.

_____ /

Unopposed Motion To Continue The Motions Deadline For Two Weeks

The government does not oppose a two-week continuance of the motions deadline, which is today, June 10, 2022. The case is set for the August term with a status conference set on July 12, 2022. Doc. 22. The time is needed to review the discovery for any potential legal issues.

Counsel would like the additional time due to scheduling issues. Counsel was out of the district for a training conference from May 9 to May 15, 2022, and then was on leave May 27 to June 1, 2022. During this time Counsel was also preparing for a major sentencing in *United States v. Brown*, 6:21-cr-115-WWB-DCI.

The discovery is somewhat voluminous and the case somewhat complex. Mr. Cisternino is accused of defrauding the Payroll Protection Program, which was enacted as part of a COVID relief package, of about \$7.2 million. He is also accused of several instances of aggravated identity theft. Thus, Mr. faces

serious consequences. The Court, of course, has the authority to extend the time of its own deadlines. See, Rule 45(b)(1), Fed.R.Crim.Proc.

Respectfully submitted,

A. Fitzgerald Hall, Esq.
Federal Defender, MDFL

/s/ Michael S. Ryan
Michael S. Ryan, Esq.
Assistant Federal Defender
Arizona Bar No. 0018139
201 S. Orange Avenue, Suite 300
Orlando, FL 32801
Telephone: 407-648-6338
Fax: 407-648-6095
E-Mail: michael_ryan@fd.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that undersigned electronically filed the foregoing with the Clerk of Court (CM/ECF) by using the CM/ECF system which will send a notice of electronic filing to Chauncey Bratt, Assistant United States Attorney, this 10th day of June 2022.

/s/ Michael S. Ryan
Attorney for Defendant