

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE No. 22-20290-CR-BLOOM/OTAZO-REYES

UNITES STATES OF AMERICA

Plaintiff,

v.

ERIC DEAN SHEPPARD,

Defendant.

DEFENDANT'S UNOPPOSED MOTION
TO CONTINUE CALENDAR CALL AND TRIAL

Defendant, Eric Dean Sheppard ("Sheppard"), respectfully files this Unopposed Motion to Continue Calendar Call and Trial. In support of this Motion, Defendant states:

1. On June 29, 2022, an Indictment was returned charging Sheppard with six (6) counts of Wire Fraud, in violation of 18 U.S.C. §1343 [D.E. 3].

2. The trial date for this matter is currently set for August 29, 2022, with a calendar call of August 23, 2022.

3. The defense has received a substantial volume of discovery regarding the six (6) transactions and requires additional time to review the discovery, conduct an investigation, and prepare the defense. Accordingly, a continuance is necessary so that the defendant can properly prepare for trial.

4. Because of the volume of discovery and complexity of the charges, Defendant respectfully requests a continuance of approximately four (4) months.

5. A four (4) month continuance falls right in the middle of the holiday period. In addition, one of the undersigned counsel will be away during that time period for his daughter's

Bat Mitzvah. Therefore, it is respectfully suggested that trial be set for the week beginning January 16, 2023, or thereafter

6. Defendant knowingly and intelligently waives his speedy trial rights under the Speedy Trial Act as necessary for purposes of this Unopposed Motion, and requests, in the interest of justice, that the Court exclude speedy trial time from August 29, 2022, through the new date set for trial.

7. The undersigned counsel conferred with Assistant United States Attorney Marty Fulgueira Elfenbein regarding the relief sought in this Unopposed Motion. AUSA Elfenbein does not oppose the relief sought.

WHEREFORE, Defendant, Eric Dean Sheppard, respectfully requests that this Court grant this Unopposed Motion to Continue Calendar Call and Trial, and for such other and further relief as may be just and proper.

Dated: August 15, 2022

Respectfully submitted,

NELSON MULLINS
One Biscayne Tower, 21st Floor
2 S. Biscayne Boulevard
Miami, FL 33131
Telephone: 305.373.9400
Facsimile: 305.995.6449

By: /s/ Jonathan Etra
Jon A. Sale
Florida Bar No. 246387
Jonathan Etra
Florida Bar No. 686905
Mark F. Raymond
Florida Bar No. 373397
Christopher Cavallo
Florida Bar No. 0092305

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 15, 2022 the foregoing document was filed via the Court's CM/ECF system to all counsel of record.

/s/ Jonathan Etra
Jonathan Etra