

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.

UNOPPOSED MOTION FOR RETURN OF SPOUSE'S PASSPORT

Defendant, Eric Sheppard, by and through his undersigned counsel, hereby files this Unopposed Motion for Return of Spouse's Passport, and as grounds therefore states:

1. Bond in this case was agreed to on July 12 and entered on July 15, 2022. [D.E. 14; D.E. 15].
2. During initial bond discussions, the defense agreed to turn over the passport of Defendant's wife, Jennifer Sheppard, as a condition of the bond. [D.E. 14 at 2; D.E. 15 at 2].
3. Ms. Sheppard is not a defendant in this case. She was born and raised in Miami.
4. Presently, Ms. Sheppard's passport is with pre-trial services, as dictated by the conditions of the bond.
5. Defendant's daughter, a sophomore in college, is traveling to Puerto Vallarta, Mexico on spring break, **February 26 through March 3, 2023**. Additionally, she is scheduled to travel to Israel on the *Birthright* program in May 2023.
6. If for some reason Defendant's daughter needs a parent, or circumstances warrant a parent's presence in Mexico, neither parent will be permitted to travel outside the country given the turnover of their passports.

7. In addition to general parental concerns about Defendant's daughter traveling to Mexico, the daughter also has special medical issues that could require immediate attention and parental involvement.

8. The government has no objection to the Court eliminating the condition of Defendant's bond that Ms. Sheppard surrender her passport, and that Ms. Sheppard's passport be returned to her.

9. Defendant has been fully compliant with pre-trial services and all requirements of his bond.

WHEREFORE, for the foregoing reasons, undersigned counsel respectfully requests that the passport of Defendant's wife, Jennifer Sheppard, presently held by pre-trial services, be returned to her forthwith.

Dated: February 17, 2023.

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/ Jayne C. Weintraub
Jayne C. Weintraub
Florida Bar No. 320382
Jonathan Etra
Florida Bar No. 686905

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 17, 2023, the foregoing document was filed via the Court's CM/ECF system to all counsel of record.

/s/ Jayne C. Weintraub
Jayne C. Weintraub