

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20290-CR-BLOOM

UNITED STATES OF AMERICA,

v.

ERIC DEAN SHEPPARD,

Defendant.

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**UNITED STATES' UNOPPOSED MOTION
TO CONTINUE THE TRIAL DATE**

The United States of America, through the undersigned Assistant United States Attorney, respectfully moves this Court for a three-week continuance of the trial in this case currently scheduled for September 11, 2023. In support thereof, the government states as follows.

1. The defendant, Eric Dean Sheppard, is charged with six counts of wire fraud stemming from the submission of Paycheck Protection Program ("PPP") and Economic Injury Disaster Loan ("EIDL") program loan applications and supporting documents that contained materially false information in order to be approved under those loan programs.

2. Included with several of the loan applications were tax returns for the applicant companies that contained false entries to support the misrepresentations on the loan applications. A key witness for the government is the defendant's long-time accountant, N.C., who for many years prepared the defendant's personal and corporate tax returns, including the tax returns for all of the companies listed on the indictment. N.C. is expected to testify about those companies and about the tax returns that he prepared for the defendant. N.C. is expected to testify that the tax returns submitted with the loan applications were not the tax returns he prepared for the applicant

companies and that his signature was forged on those tax returns.

3. N.C. has advised the government that he is scheduled to have eye surgery on August 3, 2023, and that his doctor expects he will not be able to travel for six to eight weeks thereafter. N.C. is 78 years of age. N.C. is a very important witness for the government's case.

4. The Court has granted three defense motions to continue the trial, which is now scheduled for September 11, 2023. This is the government's first request for a continuance of the trial date. The government is requesting that the trial date be continued for three weeks, to October 2, 2023, which is eight weeks and four days after N.C.'s surgery, or to a date thereafter that is convenient for the Court. The government expects its case to last approximately one week, and the defense expects its case to last several days, which in total might result in a two-week trial.

5. The defendant is currently on bond and will not be prejudiced by the brief continuance being requested here. The government has conferred with counsel for the defendant, who indicated that they are in agreement with the government's request for a continuance to October 2, 2023. Defense counsel further indicated that they are not in agreement with a continuance to a date after October 2, 2023, for the following reasons. Ms. Weintraub will be unavailable from October 20th through October 23rd. In addition, Mr. Etra will be unavailable as of October 19th for three weeks because his wife will be in trial in Tallahassee and they have a minor daughter who will need supervision. The government notes that counsel for the United States is a single parent of two minor boys who definitely need supervision. Government counsel

will be available for trial.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 20, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send Notices of Electronic Filing to all counsel of record.

s/Aimee Jimenez
Aimee C. Jimenez
Assistant United States Attorney