

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 TO TRAVEL

Defendant, Eric Dean Sheppard, respectfully submits this unopposed motion (“Motion”) permitting him to travel to the Southern District of New York and the Middle District of Pennsylvania to attend his daughter’s medical procedure. In support of the Motion, Mr. Sheppard states as follows:

1. Mr. Sheppard surrendered in this matter and made his initial appearance and arraignment on July 12, 2022.

2. Mr. Sheppard was released on a personal surety bond. Pursuant to that bond, Mr. Sheppard’s travel is limited to the Southern District of Florida, the Middle District of Florida, Eastern District of Michigan, and Eastern District of Pennsylvania, as long as Pre-Trial is notified of his departure and arrival.

3. On July 31, 2023, Mr. Sheppard plans to travel to Philadelphia (staying at the Rittenhouse Hotel) to attend his daughter’s medical procedure at Children’s Hospital of Philadelphia where she has been receiving medical treatment for the past five (5) years.

4. On August 1, 2023 to August 2, 2023, Mr. Sheppard respectfully requests to travel from the Eastern District of Pennsylvania to the Southern District of New York to meet with undersigned counsel. Mr. Sheppard will be staying at the Palace in New York.

5. On August 3, 2023, Mr. Sheppard will travel from the Southern District of New York to Philadelphia to pick up his daughter and wife and together travel to pick up his son at a summer camp nearby. Mr. Sheppard will then travel to the Southern District of New York to drop his son off where he has several medical appointments scheduled.

6. On August 4, 2023, Mr. Sheppard will travel from Newark International Airport to Miami.

7. Undersigned counsel conferred with AUSA Aimee Jimenez regarding the relief sought in this Motion who did not oppose the relief sought.

8. A proposed order granting the Motion is attached as **Exhibit A**.

WHEREFORE, Defendant, Eric Dean Sheppard, respectfully requests entry of an order permitting him to travel between Philadelphia and New York and any intervening districts on the way, from **July 31, 2023, to August 4, 2023**.

Dated July 26, 2023

Respectfully submitted,

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