

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.

AGREED TO MOTION FOR RETURN OF SON'S PASSPORT

Defendant, Eric Sheppard, by and through his undersigned counsel, hereby files this Agreed to Motion for Return of Son'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 and son as a condition of the bond. [D.E. 14 at 2; D.E. 15 at 2].
3. The Defendant's minor son is not a defendant in this case.
4. Presently, the Defendant's son's passport, which is expired, is with pre-trial services, as dictated by the conditions of the bond.
5. Defendant's son seeks to travel out of the country with his school and requires his passport. To be eligible for this trip, the Defendant's son needs to have a valid, up to date passport.
6. Accordingly, Defendant seeks the return of this son's expired passport, so that his son can get an up to date, valid passport, for use with the school trip.
7. The Government has no objection and agrees to the Court returning the Defendant's son's passport.

8. 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 son presently held by pre-trial services, be returned to him forthwith.

Dated: September 27, 2023.

Respectfully submitted,

NELSON MULLINS
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By: /s/ Jayne C. Weintraub
Jayne C. Weintraub
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 27, 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