

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

Case No. 22-20290-CR-BLOOM(s)

UNITED STATES OF AMERICA

vs.

ERIC DEAN SHEPPARD

Defendant.

**UNITED STATES' MOTION FOR EXTENSION OF TIME
TO FILE GOVERNMENT'S RESPONSE TO DEFENDANT'S
MOTION FOR JUDGMENT OF ACQUITTAL AND
DEFENDANT'S MOTION FOR NEW TRIAL**

The United States, by and through the undersigned Assistant United States Attorney, respectfully moves this Court for a one-week extension of time to respond to the defendant's motion for judgment of acquittal and motion for new trial. In support thereof, the government states as follows:

1. A jury verdict was returned in this case on Friday, January 12, 2024. Following the jury's verdict, the defense advised the Court that it was renewing its motion for judgment of acquittal. At that time, the Court gave the defendant one week to file his motion for judgment of acquittal and gave the government one week to file its response.

2. Thereafter the defendant twice moved for one-week extensions of time to file his motion or motions, which the Court granted. On Friday, February 2, 2024, the defendant filed a motion for judgment of acquittal and a motion for new trial.

3. Should the government's response to the motion for judgment of acquittal still be due within a week of the defendant's filing, the government's response would be due today,

February 9, 2024. The government requests the full ten (10) days that it would normally have under the Local Rules to respond to the defendant's motion for judgment of acquittal, and requests that the government's response to the motion for judgment of acquittal be due on Friday, February 16, 2024.

4. Regarding the government's response to the defendant's motion for new trial, the government's response is due Friday, February 16, 2024.

5. The undersigned AUSA has multiple doctor's appointments during the week of February 12th, which appointments were rescheduled from November and December of 2023. The undersigned AUSA also has other case obligations and is planning to take a couple of vacation days around the President's Day holiday. As a result, the government requests one additional week to file its response to the motion for new trial, which would be due on Monday, February 26, 2024.

6. The undersigned AUSA conferred with counsel for the defendant, who indicated that the defendant has no objection to the government's request.

7. This motion is made for good cause and not for the purpose of causing any undue delay in this case.

For the reasons set forth above, the United States respectfully requests that the Court grant the United States a one-week extension of time as to each of the defendant's motions: motion for

judgment of acquittal and motion for new trial.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 9, 2024, I electronically filed the foregoing motion and proposed order with the Clerk of the Court using CM/ECF.

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