

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.

**UNUPPOSED MOTION FOR EXTENSION OF TIME
TO FILE POST-TRIAL MOTION REPLY BRIEFS AND FOR PAGE LIMIT INCREASE**

Defendant Eric Dean Sheppard respectfully submits this Motion for Extension of Time to File Replies in Support of Post-Trial Motions and for Page Limit Increase. In support, Defendant states:

1. Trial in this matter ended January 12, 2024.
2. On February 2, 2024, Defendant filed his motion for new trial [D.E. 204] and motion for acquittal [D.E. 205] (together, the “Post-Trial Motions”).
3. Before filing its responses, the government sought and obtained leave to file an additional 5-7 pages for its response briefs. [D.E. 212; D.E. 213].
4. The government filed its responses to the Post-Trial Motions on February 23 and 26, 2024. [D.E. 214; D.E. 215]. As such, Defendant’s replies in support of the Post-Trial Motions are due on March 1 and March 4, 2024.
5. Several of Defendant’s counsel are travelling out of state for work-related matters over the next two weeks and are periodically unavailable up to and through the current reply deadlines. For this reason, as well as the number and complexity of issues that must be addressed

in post-trial briefing, Defendant respectfully requests until March 11, 2024 to file his reply in support of his motion for acquittal, and until March 13, 2024 to file his reply in support of his motion for new trial.

6. This extension is not sought for purposes of delay and will not prejudice any party. Sentencing in this matter is not scheduled until May 8, 2024. [D.E. 211].

7. Defendant also requests an additional 5-7 pages for his reply briefs in support of the Post-Trial Motions—the same page extension the government received, without objection, for its responses. The government’s response briefs raise numerous issues and arguments that Defendant needs more space to properly respond to and address.

8. Undersigned counsel met and conferred with counsel for the United States, who advised that the government does not object to the relief sought herein.

WHEREFORE, Defendant respectfully requests: (1) an extension until March 11, 2024, to file his reply in support of his motion for acquittal; (2) an extension until March 13, 2024, to file his reply in support of his motion for new trial; and (3) for an additional 5-7 pages for each of these reply briefs.

Dated: February 28, 2024.

Respectfully submitted,

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By: /s/ Christopher Cavallo

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 28, 2024, the foregoing document was filed via the Court's CM/ECF system to all counsel of record.

/s/ Christopher Cavallo
Christopher Cavallo