

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-20160- CR-KMW

UNITED STATES OF AMERICA,
Plaintiff,

vs.

LEONEL RIVERO,
Defendant.

_____/

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE PLEA HEARING

The Defendant, LEONEL RIVERO, by and through the undersigned counsel, respectfully files this Unopposed Motion to Continue the Plea Hearing and in support thereof states as follows:

1. This matter is scheduled for plea hearing on June 25, 2021.
2. However, the undersigned needs additional time to review the discovery which is voluminous. In fact, there are over 48,500 items of discovery comprised of images, documents and/or text messages as well as 329 recordings.
3. The undersigned needs additional time to review these materials to properly counsel Mr. Rivero.
4. Furthermore, On June 21, 2021 the undersigned will be commencing trial in the middle district of Florida on United States v. Andrew Hammock, Case # 3:20-cr-00058-MMH-JRK and will be unavailable on the scheduled plea date of June 25, 2021.
5. Accordingly, undersigned counsel respectfully requests a sixty (60) day continuance of the plea hearing.

6. Undersigned counsel contacted counsel for the government, Chris Browne and Della Sentilles who confirmed that they do not object to this motion.

7. This Motion is made in good faith and with no purpose of delay. The defendant understands that the time of the continuance will be excluded under the speedy trial act.

WHEREFORE, the Defendant respectfully requests that this Court grant his Unopposed Motion to Continue the Plea Hearing and enter an Order in accordance herewith.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished to: **Chris Browne & Della Sentilles, Assistant United States Attorney's** on this 7th day of June 2021.

Respectfully submitted,

By: s/ Michael Mirer
MICHAEL MIRER, ESQ.
Florida Bar No. 0119490
Attorney for the Defendant
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ORDER ON DEFENDANT'S UNOPPOSED MOTION TO CONTINUE PLEA HEARING

THIS CAUSE, having come on for consideration before the Court, upon the Defendant's Unopposed Motion to Continue Plea Hearing said Motion and being otherwise fully advised on its premises, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Unopposed Motion to Continue Plea Hearing is hereby_____.

DONE AND ORDERED in Miami, FL this _____ day of _____
2021.

THE HONORABLE KATHLEEN M. WILLIAMS
U.S. DISTRICT COURT JUDGE

cc: Michael Mirer, Esq.
Chris Browne, AUSA
Della Sentilles, AUSA