UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-60020-CR-DIMITROULEAS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIO KUSTURA, et al,

Defendant.
_____/

DEFENDANT'S MOTION TO EXTEND THE TIME TO FILE OBJECTIONS TO THE PRESETENCING INVESTIGATION REPORT AND MOTION TO CONTINUE SENTENCING

The Defendant, Mario Kustura, through counsel, files this Motion to Continue Sentencing in this matter that is currently scheduled for September 23, 2021 and in support states the following:

1. On July 15, 2021, Mr. Kustura pled guilty to Count 10 of a 35-count Indictment. Count 10 charged him with conspiracy to offer and pay kickbacks prohibited by the Eliminating Kickbacks and Recovery Act (EKRA), in violation of 18 U.S.C. § 371.
2. The Presentencing Investigation Report was disclosed on August 17, 2021 by United States Probation.
3. Sentencing is currently scheduled for September 23, 2021 at 1:15 p.m.
4. Mr. Kustura is expected to testify in his co-defendants' trial which is scheduled to commence on September 13, 2021, before this Honorable Court.

5. Undersigned counsel needs more time to focus on and prepare for sentencing with her client.
6. Undersigned counsel has discussed this request with SAUSA, Jamie deBoer, and SAUSA James Hayes, and they do not have an objection to this request.

Accordingly, Mr. Kustura respectfully asks the Court to continue his sentencing for a period of 70 days.

Respectfully submitted,

MICHAEL CARUSO
FEDERAL PUBLIC DEFENDER

By: s/ Huda Ajlani-Macri
Huda Ajlani-Macri
Assistant Federal Public Defender
Florida Bar No. 27831
1 E. Broward Boulevard, Suite 1100
Fort Lauderdale, Florida 33301
Tel: (954) 356-7436
E-mail: Huda_Ajlani-Macri@fd.org

CERTIFICATE OF SERVICE

I HEREBY certify that on September 12, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/Huda Ajlani-Macri
Huda Ajlani-Macri