

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIM.NO.24-cr-267 (KMW)
	:	
ADRIENNE PONZO	:	

**EMERGENT NOTICE OF MOTION FOR AN ORDER EXTENDING DEFENDANT’S
VOLUNTARY SELF-SURRENDER DATE OR, IN THE ALTERNATIVE, RECOMMENDING
DESIGNATION TO A BUREAU OF PRISONS FEDERAL MEDICAL CENTER**

ORAL ARGUMENT IS NOT REQUESTED

TO: Honorable Karen M. Williams, U.S.D.J.

PLEASE TAKE NOTICE that Defendant Adrienne T. Ponzo, by and through her attorney, Troy A. Archie, Esq., respectfully moves this Court on an emergent basis for an Order extending Defendant’s voluntary self-surrender date. In the alternative, Defendant respectfully requests that this Court recommend that the Bureau of Prisons immediately designate Ms. Ponzo to an appropriate Federal Medical Center or other medically appropriate Bureau of Prisons facility capable of treating her significant respiratory and spinal conditions and, to the extent practicable, designate her to a facility closer to her residence to permit meaningful family visitation during her custodial sentence.

This Motion is supported by the attached Certification of Counsel, the accompanying Memorandum of Law, the attached medical records and physician opinions, and all prior proceedings before this Court.

Counsel respectfully advises the Court that this Motion is being filed immediately after learning of significant new medical developments while counsel is temporarily away on a previously scheduled family vacation. Due to limited internet connectivity while traveling internationally, counsel has been unable to communicate with the Government before filing this emergent application. Counsel files this Motion out of an abundance of caution so that the Court may consider these newly developed circumstances as soon as possible. Upon restoration of reliable internet service, counsel will immediately provide the Government with a copy of this Motion and advise the Court of the Government’s position if one is received.

Oral argument is respectfully not requested.

Respectfully submitted,

/s/ Troy A. Archie, Esq.

Attorney for Defendant