UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 26-CR-60019-ALTMAN

UNITED STATES OF AMERICA,

v.

ROODY METELUS,

Defendant.
_____/

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL

Roody Metelus, through undersigned counsel, respectfully moves for a first continuance of his trial and accompanying pre-trial deadlines. Undersigned counsel has conferred with counsel for the Government, AUSA Aimee C. Jimenez, and the Government has no objection to the relief requested. Mr. Metelus respectfully requests a continuance of the trial until May of 2026 based on the following good cause:

Mr. Metelus was charged via an Information on January 26, 2026. Arraignment occurred on February 5, 2026, and Mr. Metelus is currently on a personal surety bond and has been compliant with all terms of pre-trial supervision. Calendar Call in this matter has been set for March 3, 2026, and a Jury Trial is set for March 9, 2026. Undersigned counsel received discovery on this matter on February 19, 2026. Counsel requires additional time to review the discovery with Mr. Metelus. This matter will likely be set for a change of plea before the next Calendar Call setting, assuming this motion is granted, but counsel still must review the discovery in full before a change of plea.

Undersigned counsel is requesting a continuance to May of 2026 due to several scheduling conflicts in March and April. Counsel will be in San Diego for the annual ABA White Collar Conference from March 10 to March 13. On March 23, counsel is set for trial in the matter of *United States v. Ali Correa*, 25-cr-20367-Gayles. On March 25th, counsel has a complex post-trial sentencing in United States v. *Sandro Herek*, 24-cr-20078-Graham. On April 19, counsel is scheduled for a special-set jury trial in a life felony sexual battery matter in Palm Beach County,

State of Florida v. Anthony Ciulla, 2023CF997534, with pre-trial motion hearings proceeding throughout early April.

Good cause exists for the continuance requested herein because if the continuance is not granted, undersigned counsel will not have adequate time to review the discovery in this matter with his client before any pre-trial resolution. This motion is made in good faith and not to cause any undue delay to any party, pursuant to the Speedy Trial Act, 8 U.S.C. §3161(h)(7)(A). For the reasons stated above, the need for the defense to be properly prepared before a plea or trial outweighs the interests of the public in a speedy trial hearing. Mr. Correa waives his right to a speedy trial for any period of time resulting from the date this motion is granted to the new trial setting. Pursuant to Local Rule 88.9, undersigned counsel certifies met and conferred with the Government, and the Government does not oppose this motion.

WHEREFORE, Roody Metelus, through undersigned counsel, respectfully moves this Honorable Court to continue the trial and accompanying pre-trial deadlines in this matter to May of 2026, or another time that the Court deems appropriate based on the relief requested herein.

Respectfully Submitted,

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By: ***/s/ DAVID TARRAS***
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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2026, a true and correct copy of the foregoing was served via CM/ECF on all counsel or parties of record.

By: ***/s/ David Tarras***
David Tarras, Esq.