

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 07-80138-CR-MARRA/VITUNAC

UNITED STATES OF AMERICA, :

Plaintiff, :

vs. :

FRANK SARCONA, :

Defendant. :

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JOINT MOTION TO CONTINUE TRIAL DATE

Frank Sarcona, by counsel, and the United States by Kerry Baron, Assistant United States Attorney, hereby files this Joint Motion to Continue the Trial Date, and request for status for the following reasons:

1. On September 17, 2007, Sarcona was arraigned on this indictment.
2. On September 19, 2007, this Court set the trial date for October 29, 2007.
3. The indictment is extensive and the discovery is over 100 boxes of material.
4. Both the Government and Sarcona need time to review and organize the discovery

and confer with our respective clients.

WHEREFORE, both the Government and Sarcona request that this Court continue the trial date currently set, and set a status date to determine a trial date in the future.

Respectfully submitted,

KATHLEEN M. WILLIAMS
FEDERAL PUBLIC DEFENDER

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 20, 2007, undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF and has served same via U.S. Mail to those counsel(s) who are not authorized to receive electronically Notice of Electronic Filing.

s/Samuel J. Smargon
Samuel J. Smargon