

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
CRIMINAL DIVISION

CASE NO.: 8:24-cr-66-KKM-NHA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIRTZA OCANA,

Defendant.

_____ /

UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE

COMES NOW, the Defendant, MIRTZA OCANA, and moves this Honorable Court to continue the status conference of May 14, 2024, in the above styled cause. As grounds therefore, the Defendant avers the following:

1. The Defendant was brought before this Court on February 6, 2024, on an Initial Appearance.
2. Undersigned counsel entered his appearance on April 22, 2024.
3. The parties are currently attempting to put together a plea agreement that could resolve this matter in its entirety.
4. Undersigned counsel is also in the process of evaluating the case for possible defenses.
5. There is a status conference on May 14, 2024.
6. Undersigned counsel would not be ready to announce ready for trial.
7. Undersigned would respectfully request a 30-day continuance of the May 14, 2024, status conference to complete plea negotiations and finish evaluating the case for defenses.

8. Undersigned counsel has specifically advised his client that by requesting this continuance, or consenting thereto, the defendant is aware that the Court may conclude that there is good cause to exclude time from the speedy trial calculation (not that defendant “waives” speedy trial).
9. The Government, by and through the duly appointed AUSA, Michael Buchanan, has no objection to this motion.
9. This Motion is made in good faith and not for purposes of undue delay.

WHEREFORE, based on the foregoing, the Defendant respectfully requests that this Honorable Court continue the status conference for 30 days.

Respectfully Submitted,

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By: /s/ Juan C. Mercado
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was duly serve on the United States this 9th day of May 2024, by filing same on the United States District Court CM/ECF filing system, which automatically and electronically serves all attorneys of record.

By: /s/ Juan C. Mercado
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