

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA

v.

CARLOS RAMON POLIT FAGGIONI

**UNOPPOSED MOTION TO CONTINUE THE ARRAIGNMENT
AND REPORT RE COUNSEL UNTIL MAY 27, 2022**

Defendant moves the Court to reset the arraignment and report re counsel (currently set for May 17, 2022) until May 27, 2022, to give him additional time to make financial arrangements to retain undersigned to file a permanent appearance as trial counsel in this Category III case. See DE#1:12. Defendant waives speedy trial rights occasioned by this continuance because it is in the interest of justice to give him additional time to exercise his right to counsel of choice.¹

¹ For undersigned to make a permanent appearance, the defendant needs to arrange for payment of fees and expenses through trial, given this district's requirement that "[r]etained criminal defense attorneys are expected to make financial arrangements satisfactory to themselves and sufficient to provide for representation of each defendant until the conclusion of the defendant's case at the trial level," and the admonition that "failure of counsel to collect a sum sufficient to compensate him for

AUSA Berger informed undersigned that the government does not object.

Respectfully submitted,

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PLAN V

all the services usually required of defense counsel, will not constitute good cause for withdrawal after arraignment.” Rule 88.7(a-c), Local Rules Southern District of Florida.