

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. 21-CR-00299
(RBW) :

MARIPOSA CASTRO/ :
Imelda Acosta :
 :
 Defendant. :

UNOPPOSED REQUEST FOR EXTENSION OF SURRENDER DATE

COMES NOW, the defendant, through undersigned counsel, and respectfully moves this court extend her surrender date of May 2, 2022, to May 10, 2022. Ms. Acosta was sentenced before the Court on February 23, 2022, to 45 days incarceration. She was given an initial surrender date March 31, 2022. Ms. Acosta requested an extension to May 2, due to health issues. The Court granted a request and the current surrender date is May 2, 2022. However, since the request to extend the surrender date, Ms. Acosta has realized that she needs an additional 7 days extension. Her daughter is scheduled to be married beginning May. The daughter has with great emotion, repeatedly asked her mother to be able to attend her wedding in Hawaii. Ms. Acosta has finally relented and has suggested to her daughter she will “attend” virtually if permitted. Ms. Acosta’s granddaughter’s birthday follows on May 6, and then on May 8, it is mother’s day. Ms. Acosta would like to be able to virtually attend all these important celebrations with her family because her family has repeatedly requested to her she do so and particularly her daughter has been in tears. To not have her children suffer further, she requests the Court extend her surrender date to May 10, 2022.

Jordan, Konig, Esq., Government counsel does not oppose this request and defers to the Court's ruling.

WHEREFORE, for the above stated reasons, Ms. Acosta, moves this Honorable Court extend her surrender date from May 2 to May 10, 2022.

Respectfully submitted,

OFFICE OF ELITA C. AMATO

/s/

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CERTIFICATE OF SERVICE

I hereby certify that this Memorandum was filed electronically through the ECF filing system on this 13th day of April 2022, thereby, providing service electronically upon all parties in this case.

/s/

Elita C. Amato