

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIK HERRERA,

Defendant.

Case No. 1:21-CR-00619-BAH

**UNOPPOSED MOTION TO CONTINUE**

**SELF-SURRENDER DATE**

Defendant Erik Herrera by and through his attorney of record, Federal Public Defender Cuauhtemoc Ortega, hereby moves to continue his self-surrender date from March 2, 2023 to March 10, 2023. In support of this motion, defense counsel offers the following:

1. On January 13, 2023, Mr. Herrera appeared before this Court for sentencing and was sentenced to serve a total term of 48 months imprisonment. The Court allowed Mr. Herrera to remain on bond pending his designation to a facility by the Bureau of Prisons (BOP).

2. Mr. Herrera has now been designated by the BOP to FCI Terminal Island. He is to self-surrender to the facility by March 2, 2023, at 2:00 PM.

3. By this motion, Mr. Herrera respectfully requests that the Court grant a brief continuance of the self-surrender date to March 10, 2023, at 2:00 PM. The additional days will allow Mr. Herrera to attend a family event for his father's birthday and to conclude his preparations to enter custody. Mr. Herrera and his family have been preparing for his departure, but they need additional time to finish moving Mr. Herrera's belongings out of the family home and into storage. The additional time will also permit Mr. Herrera to obtain complete refills for his medication that he can bring with him when he reports to custody.

4. The government does not object to Mr. Herrera's continuance request.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: February 21, 2023.

By /s/ Cuauhtemoc Ortega

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