

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**UNITED STATES OF AMERICA**

**Vs.**

**CASE NO.: 8:19-cr-334-T-35CPT**

**JOSEPH S. ANILE, II**  
\_\_\_\_\_ /

**MOTION TO CONTINUE SENTENCING HEARING**

**COMES NOW**, the Defendant, JOSEPH S. ANILE II, by and through his undersigned local counsel and pursuant to Middle District of Florida Local Rule 3.09 and 4.12, and hereby respectfully moves this Honorable Court for a 6-month continuance of the sentencing hearing currently scheduled for April 6, 2020 at 10:00 a.m. In support hereof, the Counsel submits the following Memorandum in Support.

**MEMORANDUM IN SUPPORT**

1. On September 26, 2019, Mr. Anile entered a plea in the above-referenced matter pursuant to a plea agreement with the government.
2. That there are pending matters related to the parties' plea agreement which would directly relate to and be adduced to this Honorable Court for purposes of rendering a sentence that entails all relevant information for this Honorable Court's consideration.
3. That a continuance of the currently scheduled hearing would also be in the interest of judicial economy by obviating the need for a sentencing hearing that does not take into

consideration all relevant information and a subsequent re-sentencing hearing that would provide the ability to provide the Court with all relevant information.

4. On February 27, 2020, undersigned counsel communicated with AUSA Rachelle DesVauxBedke, Esq., concerning matters related hereto.
5. Pursuant to communications with the government, a 6-month continuance should allow sufficient time to allow for the full development of matters that would be appropriately addressed at sentencing in this case. Based on communications with AUSA DesVauxBedke, the government does not object to the relief requested herein.
6. That Mr. Anile has scrupulously adhered to his pre-trial release conditions and will continue to do so. Additionally, Mr. Anile recently underwent a major life-threatening medical event from which he is still recuperating. A continuance would also provide the benefit for him to receive necessary medical care in the hopeful continuation of the recovery process.
7. That this motion is not made for dilatory purposes but is rather made in the interest of justice and judicial economy.

**WHEREFORE** in light of the foregoing, it is respectfully requested that this Honorable Court grant a 6-month continuance of the sentencing hearing currently scheduled for April 6, 2020.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically served to the Clerk of Court and AUSA Rachelle DesVauxBedke, Esq, for the United States Attorney's Office via PACER on this 2<sup>nd</sup> of March, 2020.

/s/ Michael Gonzalez

Michael Gonzalez, Esq.

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