

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20477-CR-RUIZ/LOUIS

UNITED STATES OF AMERICA,
Plaintiff,

vs.

FRANK JAVIER RAVELO,
Defendant.

_____ /

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL

The Defendant, FRANK JAVIER RAVELO, by and through the undersigned counsel, respectfully files this Unopposed Motion to Continue Trial and, in support thereof, states as follows:

1. This matter is scheduled for a Calendar Call on December 9, 2025, and a Trial on December 15, 2025.
2. The undersigned recently received discovery from the Government, which is extremely voluminous, as various electronic devices were searched in relation to the executed search warrant.
3. Accordingly, the undersigned respectfully requests a forty-five (45) day continuance of the trial date.
4. The undersigned has conferred with AUSA Emily Stone, who does not oppose this request.

5. This Motion is made in good faith and with no purpose of delay. The undersigned acknowledges and understands that the time of the continuance will be excluded under the Speedy Trial Act.

WHEREFORE, the Defendant respectfully requests that this Court grant the instant Unopposed Motion to Continue Trial and enter an Order consistent with the relief requested herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and the foregoing was furnished to: **Emily Stone, Assistant United States Attorney**, on this 2nd day of December 2025.

Respectfully submitted,

By: *s/ Michael Mirer*
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ORDER ON DEFENDANT’S UNOPPOSED MOTION TO CONTINUE TRIAL

THIS CAUSE, having come on for consideration before the Court, upon the Defendant’s Unopposed Motion to Continue Trial, said Motion and being otherwise fully advised on its premises, it is hereby:

ORDERED AND ADJUDGED that the Defendant’s Unopposed Motion to Continue Trial is hereby _____.

DONE AND ORDERED in Miami, FL, this _____ day of _____ 2025.

THE HONORABLE RODOLFO A. RUIZ
U.S. DISTRICT COURT JUDGE

cc: Michael Mirer, Esq.,
Emily Stone, Esq., AUSA