

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-60234-ZLOCH/SNOW

UNITED STATES OF AMERICA, :

Plaintiff, :

vs. :

KARIN MARSHALL, :

Defendant. :

\_\_\_\_\_/

**UNOPPOSED MOTION FOR PERMISSION TO TRAVEL**

The Defendant, Karin Marshall, through counsel, respectfully moves for permission to travel outside the District, and in support states as follows:

1. On September 3, 2008, the Defendant was arraigned on a 20 count wire fraud indictment. On January 14, 2009, she pled guilty to Count I. Sentencing is scheduled for March 25, 2009.

2. Ms. Marshall was released on bond on September 4, 2008 (\$250,000 personal surety and \$50,000 10%). She has complied with all conditions of bond.

3. Ms. Marshall seeks permission to travel to Orlando, Florida to attend a church function with her 12 year old daughter. Ms. Marshall would leave on Friday, January 23, 2009 at approximately 12:00 noon and return Saturday, January 24, 2009 at approximately 9:30 p.m. Ms. Marshall would be staying at the Baymont Inn & Suites, 7531 Canada Avenue, Orlando, Florida 32819, (407) 226-9887.

4. The Court has previously granted two similar motions, and travel has been completed without incident.

5. Counsel has contacted Assistant United States Attorney Marc Anton and Pretrial Services Officer Carol Siroto. Mr. Anton and Ms. Siroto have no objection to the granting of the relief requested in this motion.

WHEREFORE, the Defendant requests that this Court grant permission to travel as outlined above.

Respectfully submitted,

KATHLEEN M. WILLIAMS  
FEDERAL PUBLIC DEFENDER

By: s/Patrick M. Hunt  
Patrick M. Hunt  
Assistant Federal Public Defender  
Florida Bar No. 571962  
1 E. Broward Boulevard  
Suite 1100  
Fort Lauderdale, Florida 33301  
(954) 356-7436  
(954) 356-7556 (fax)  
[Patrick.Hunt@fd.org](mailto:Patrick.Hunt@fd.org)

**CERTIFICATE OF SERVICE**

I HEREBY certify that on January 15, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

*s/Patrick M. Hunt*

---

Patrick M. Hunt

**SERVICE LIST**

**UNITED STATES OF AMERICA v. KARIN MARSHALL**

**Case No. 08-60234-CR-ZLOCH/SNOW**

**United States District Court, Southern District of Florida**

Patrick M. Hunt, Esquire  
[Patrick.Hunt@fd.org](mailto:Patrick.Hunt@fd.org)  
Federal Public Defender's Office  
1 E. Broward Blvd.  
Suite 1100  
Fort Lauderdale, Florida 33301  
Telephone: (954) 356-7436  
Facsimile: (954) 356-7556  
Attorney for Karin Marshall  
[Service via CM/ECF]

Marc S. Anton, Esquire  
[Marc.Anton@usdoj.gov](mailto:Marc.Anton@usdoj.gov)  
United States Attorney's Office  
500 E. Broward Blvd.  
7th Floor  
Fort Lauderdale, Florida 33301  
Telephone: (954) 356-7255  
Facsimile: (954) 356-7336  
Attorney for United States of America  
[Service via CM/ECF]

Ms. Carol Sirotto  
United States Probation Office  
101 N.E. 3rd Avenue  
Suite 200  
Fort Lauderdale, Florida 33301  
Telephone: (954) 769-5605  
Facsimile: (954) 769-5669  
[Service via Interagency Mail]