

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 March 25, 2009 the Defendant was sentenced to a term of 41 months on a wire fraud conviction. The Court allowed her to voluntarily surrender to the Bureau of Prisons on or before July 17, 2009.

2. Ms. Marshall has been free on bond since 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, June 5, 2009 at approximately 6:00 a.m. and return Friday night, June 5, 2009 at approximately 9:30 p.m.

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

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CERTIFICATE OF SERVICE

I HEREBY certify that on May 20, 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

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