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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

**CASE NO: 21-CR-175-TJK** 

v.

**ENRIQUE TARRIO,** 

Defendant.

\_\_\_\_\_

ENRIQUE TARRIO'S EMERGENCY MOTION FOR FURLOUGH

COMES NOW the Defendant, Enrique Tarrio, by and through his attorneys, and

respectfully moves this Honorable Court to allow him a short furlough to attend the funeral of his

grandmother Rosa Pardo Tarrio.

Rosa Pardo Tarrio raised Enrique Tarrio. Mr. Tarrio is devastated by the news of her

passing and very much wishes to be present at her funeral and cremation ceremony.

The funeral would be on Friday September 9, 2022 from 3:00PM-11:00PM at La Paz

Funeral Home, 3500 NW 7 Street, Miami, Florida 33125, and the cremation ceremony would be

on Saturday September 10, 2022 from 9:00AM-1:00PM at the same location. After the funeral

and cremation ceremony, Mr. Tarrio will return to FDC Miami. All expenses of the furlough will

be paid by the Tarrio family.

Undersigned counsel conferred with the government regarding their position to the

instant motion, and they will defer to this Honorable Court.

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**WHEREFORE**, Tarrio respectfully moves this Honorable Court to allow a short furlough to attend the funeral and cremation ceremony of his grandmother.

Respectfully submitted, /s/ Nayib Hassan Florida Bar No. 20949 Attorney for Defendant Law Office of Nayib Hassan, PA 6175 NW 153 St., Suite 221 Miami Lakes, Florida 33014 Tel. No.: 305.403.7323

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/s/ Sabino Jauregui, Esq. Florida Bar Number 503134 Jauregui Law, P.A. 1014 West 49 Street Hialeah, Florida 33012 Phone 305-822-2901 FAX 305-822-2902

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was electronically noticed through the CM/ECF system to the US Attorney's Office on this 8<sup>th</sup> day of September, 2022 to the following:

Jason McCollough Erik Kenerson Nadia Moore Conor Mulroe

/s/ Nayib Hassan
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