

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 23-60005-CR-SMITH

vs.

STANTON WITHERSPOON,

Defendants.

\_\_\_\_\_ /



**UNOPPOSED MOTION TO EXTEND SURRENDER**

**COMES NOW**, the Defendant, STANTON WITHERSPOON, by and through his undersigned counsel, respectfully moves this court to grant a ninety (90) day extension of the Defendant's surrender date (currently set for October 20, 2025) to January 18, 2026 without opposition from the government. In support of this motion, the Defendant states as follows:

1. On November 2nd, 2023, the Defendant was sentenced to forty-one (41) months imprisonment. At the time of sentencing, this honorable Court stated that the sentence was being imposed without consideration to undersigned counsel's arguments pursuant to U.S.S.G §3553 or any assistance the defendant provided the government.

2. At the time of sentencing, it was made clear to the court that Mr. Witherspoon anticipated receiving a sentence reduction based on his cooperation. There are currently outstanding aspects related to Mr. Witherspoon's cooperation that are still not completed.

3. It is anticipated that the remaining cooperation will be concluded within the next ninety (90) days.

4. Undersigned counsel has spoken with Assistant United States Attorney Chris Clark, the prosecutor in the case sub judice. The government is not opposed to continuing Mr. Witherspoon's surrender date and has authorized undersigned counsel to so state.

5. Mr. Witherspoon is not a danger to the community, and he is not a flight risk. Mr. Witherspoon has been compliant with all his conditions of bond, and there have been no reported violations.

**WHEREFORE**, for the reasons set forth above and in the interests of justice undersigned counsel asks this court to grant this motion and extend Mr. Witherspoon's surrender date to January 18, 2026.

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record this 9th of October 2025.



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Respectfully submitted,

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By: /s/ Annabelle Nahra Nadler  
ANNABELLE NAHRA NADLER  
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**UNOPPOSED ORDER TO EXTEND SURRENDER**

**THIS CASE** having come before the Court on the Defendant's Unopposed Motion to Extend Surrender Date, and the Court being fully apprised of the circumstances, it is hereby **ORDERED** and **ADJUDGED** as follows:

The Defendant's Unopposed Motion to Extend Surrender Date is **GRANTED**. The Defendant is set to surrender on January 18, 2026, at 12:00 P.M.

**DONE** and **ORDERED** in Chambers, in Broward County, Florida, this \_\_\_ day of \_\_\_\_\_ 2025.

\_\_\_\_\_  
RODNEY SMITH  
United States District Judge

Copies furnished to:

Annabelle Nahra Nadler, Esquire  
Christopher Clark, Esquire, Assistant United States Attorney  
Clerks Office  
U.S. Pretrial Services