

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

CASE NO. 17-CR-20559-CMA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JATAVIA JOHNSON,

Defendant.

_____ /

MOTION TO DELAY SURRENDER

COMES NOW, the Defendant, JATAVIA JOHNSON, by and through her undersigned attorney, and moves this Honorable Court to enter an order to delay her surrender to federal custody and as grounds thereof states the following:

1. The Defendant was sentenced on January 29, 2018, to a term of imprisonment for 24 months.
2. At sentencing, the undersigned counsel provided this Honorable Court with a schedule of shows and performances that would lead up to a performance at the BET Awards on June 24, 2018 for the Defendant. This Honorable Court considered the once in a lifetime opportunity that the Defendant had in front of her and gave her a surrender date of June 25, 2018.
3. Since the sentencing, the Defendant and her two girl music group has experienced a meteoric rise in stardom. The Defendant has performed in Rolling Loud (the largest and most exclusive hip hop festival in the world) and Rap Caviar. She is also scheduled to perform at the BET Awards this upcoming Sunday. The

Defendant now has over 3 million views on YouTube and they have over one million streams across various platforms. The Defendant is a star.

4. While this Honorable Court has been extremely generous in allowing the Defendant to remain at liberty for this period of time, we are asking for another 30 days. This is due a recent cosign from Drake (other noticeable cosigns include Migos, DJ Khaled, Cardi B, Rick Ross and Trina). It will take three weeks to do the work that needs to be done and then the Defendant can surrender as her first album and its promotion will be done. She can do her time knowing that upon her release her group will be ready to start their second album and tour.
5. If the Court is not inclined to grant this additional request for 30 days, I would ask to allow the Defendant until the 29th of June. This is due to the fact that when I requested the stay at sentencing I mistakenly believed that the BET Awards were in Atlanta. However, they are in Los Angeles. Getting the Defendant on a flight after her performance from the West Coast to Miami is a scheduling nightmare that may result in unintentional delay. The request for the 29th is an agreed upon date with AUSA Joshua Rothstein.
6. Undersigned counsel has conferred with Assistant United States Attorney Joshua Rothstein and has no objection with the Defendant surrendering Friday, June 29, 2018; five days past her original surrender date.

WHEREFORE, the Defendant, JATAVIA JOHNSON, respectfully requests that this Honorable Court enter an order delaying her surrender in the above-styled cause.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed this 21st day of June, 2018, with the Clerk of Court through CM/ECF.

Respectfully submitted,

SAAM ZANGENEH, P.A.
14 Northeast 1st Avenue, Suite 300
Miami, Florida 33132
Telephone: (305) 441-2333
Facsimile: (305) 908-8693
Email: saam@zangenehlaw.com

/s/ *Saam Zangeneh*

By: Saam Zangeneh, Esq.
Fla. Bar No.: 526721