

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff

v

RAMON ORTA RODRIGUEZ, et al

Defendants

CRIMINAL NO.: 17-371 (PAD)

MOTION FOR CHANGE OF PLEA

TO THE HONORABLE COURT:

COMES NOW defendant, Edgardo Vázquez-Morales, through his undersigned counsel, and very respectfully states and prays as follows:

1. The appearing defendant has been engaged in discussions with the United States aimed at resolving the case against him by Plea Agreement. Based on these discussions, the undersigned and AUSA Seth A. Erbe have reached an agreement in principle, but which as of this date has not been formally approved by the government. Nevertheless, it is expected that a formal agreement will be signed shortly.

2. On this basis, and subject to the United States' approval of the agreement outlined above, the appearing defendant hereby moves to change his plea and requests that the Court set the matter for a hearing.

WHEREFORE, it is respectfully requested that the Honorable Court take note of the above and grant the foregoing motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 25th day of January, 2018.

I HEREBY CERTIFY that on January 25th, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsels of record.

MANUEL SAN JUAN
USDC-PR No.: 204706
P.O. Box 9023587
San Juan, Puerto Rico 00902-3587
Tel.: (787) 723-6637 / (787) 723-6669
Fax: (787) 725-2932