

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA                   §  
  §  
  §     CRIMINAL NUMBER C-17-1015M  
  §  
JUAN ENRIQUE ESCOBEDO-MORENO         §

**EMERGENCY MOTION FOR STAY AND RECONSIDERATION OF RELEASE  
ON BOND**

COMES NOW the United States of America, by and through Abe Martinez, the Acting United States Attorney for the Southern District of Texas, and Kenneth A. Cusick, Assistant United States Attorney, and files this **EMERGENCY MOTION FOR STAY AND RECONSIDERATION OF RELEASE ON BOND**. There are facts and evidence which were not known to the government's attorney at the time this case was called for preliminary and detention hearings this morning. Late this morning, the Government received information that a deceased alien was found in the truck driven by the defendant.

For the foregoing reasons, the United States requests a stay of the decision of the release on bond.

Respectfully submitted,

ABE MARTINEZ  
ACTING UNITED STATES ATTORNEY

By: s/*Kenneth A. Cusick*  
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CERTIFICATE OF SERVICE

I, Kenneth A. Cusick, Assistant United States Attorney, hereby certify that a true and correct copy of the foregoing Emergency Motion for Stay and Reconsideration of Release on Bond has been delivered to attorney of record for the defendant via the electronic case filing notification on October 6, 2017.

*s/Kenneth A. Cusick*  
KENNETH A. CUSICK  
Assistant United States Attorney