

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

DEBORAH SANDOVAL
SALVADOR SANDOVAL, JR.,
Defendants.

Criminal Case No. 21-cr-00195

MOTION TO CONTINUE HEARING

COMES NOW, Defendant Salvador Sandoval, Jr., by and through counsel, and for his Motion to Continue Hearing states to the Court as follows:

1. A Motions Hearing is currently set for March 23, 2022.
2. Beginning March 22, 2022, undersigned counsel is scheduled to be in a two-week trial for State of Iowa vs. Greg Maxwell, Marshall County Case No. FECR0952601.
3. The undersigned counsel has contacted Special Assistant United States Attorney Louis Manzo, counsel for the Government, and Anthony Martin, counsel for Deborah Sandoval, and both have no objection to a continuance.
4. Undersigned counsel is in receipt of the Government's Consent Motion to Continue Motion Deadline and Hearing (Document 47) and agree that the Motions Hearing be continued until April 27, 2022 and that the reply deadline to the defense motions be March 15, 2022.

WHEREFORE, Salvador Sandoval, Jr. requests this Honorable Court grant his Motion to Continue Hearing.

RESPECTFULLY SUBMITTED:

KUTMUS, PENNINGTON & HOOK, PC

/s/ William Kutmus
William Kutmus AT0004450
Bill@KPHlawfirm.com

/s/ Trever Hook

Trever Hook AT0003580
5000 Westown Parkway, Suite 310
West Des Moines, IA 50266
Phone: (515) 288-3339
Fax: (515) 288-8629
Trever@KPHlawfirm.com
**ATTORNEYS FOR DEFENDANT
SALVADOR SANDOVAL, JR.**

CERTIFICATE OF SERVICE

I hereby declare that on February 10, 2022, I electronically filed the foregoing with the Clerk of Court using the ECF system which will send notification of such filing to the following:

Mr. Louis Manzo
Department of Justice
1400 New York Avenue NW
Washington, DC 20002

/s/ Jodi A. Nissen