

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

UNITED STATES OF AMERICA)	Docket No. 1:21-cr-00195
)	
)	
v.)	ELECTRONICALLY FILED
)	
)	
DEBORAH SANDOVAL)	
)	
Defendant.)	

MOTION TO CONDUCT SENTENCING HEARING VIA VIDEOCONFERENCE

AND NOW, to-wit, comes Defendant, Deborah Sandoval (hereinafter “Ms. Sandoval”) by and through her attorney, Komron Jon Maknoon, Esquire, and respectfully files this Motion to Conduct the Sentencing Hearing via Videoconference and, in support thereof, avers as follows:

1. Currently scheduled is sentencing on May 1, 2023, at 10:00 am, on misdemeanor charges.
2. Ms. Sandoval understands her right to be physically present at her Sentencing Hearing, and she is aware of this Court’s Orders suspending and limiting court appearances due to the Covid-19 crisis; and she therefore requests that her Sentencing Hearing be conducted via video pursuant to, and consistent with, the provisions contained in the CARES Act Administrative Order entered in this District on February 6, 2023 at Standing Order No. 23-06 (BAH).
3. Ms. Sandoval resides in Iowa and is concerned about recent reports of flu/illness/potential exposures during her travels.
4. Additionally, undersigned counsel, whose office is located in Pennsylvania, frequently visits his father, who is elderly, and due to a weakened immune system, is concerned about exposure.

5. For these reasons, Ms. Sandoval waives her right to be present at her Sentencing Hearing and requests leave to participate in this hearing via videoconference so that it might be expeditiously concluded without posing any risk to herself, undersigned counsel, and others.

6. On April 25, 2023, undersigned spoke with Ms. Sandoval who gave her consent to conduct the Sentencing Hearing via videoconference.

7. On April 25, 2023, undersigned counsel spoke with Assistant United States Attorney Holly Grosshans who does not object to the relief requested within.

WHEREFORE, Ms. Sandoval respectfully requests that this Honorable Court enter an Order permitting the Sentencing Hearing to be conducted via videoconference.

Respectfully submitted,

s/ Komron Jon Maknoon
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