United States District Court
District of Columbia

United States of America,

        Plaintiff,

v.

Daniel Rodriguez,

        Defendant.

Case No. 1:21-cr-00246-ABJ-1

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

The defendant, Daniel Rodriguez, by and through his counsel of record, requests this Court continue the sentencing hearing from May 16, 2023, to July 10, 20123, August 21, 2023, or a later date to allow Mr. Rodriguez sufficient time to consult with counsel and prepare for sentencing given the communication challenges that come with Mr. Rodriguez being housed in Pennsylvania while defense counsel is located in Nevada. Moreover, with regard to Mr. Rodriguez's detention status, and so this Court is aware, Mr. Rodriguez is currently being in housed at a BOP facility, as he was moved from the pretrial detention facility in Northern Neck, Virginia in December of last year.

This continuance is also necessary defense counsel is starting trial on May 8, 2023, which appears may now last longer than five days. Mr. Rodriguez's counsel has discussed this request with the government, and they do not object to a continuance.

For the foregoing reasons, Mr. Rodriguez respectfully requests this Court continue the sentencing hearing from May 16, 2023, to July 10, 2023, August 21, 2023 or a later date. The proposed dates are offered after conferring with the government regarding their schedules and the schedule of their victim witness.

Dated: April 28, 2023.

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Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/Rebecca A. Levy
/s/Margaret W. Lambrose
/s/Katherine A. Tanaka
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By:

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REBECCA A. LEVY
MARGARET W. LAMBROSE
KATHERINE A. TANAKA
Assistant Federal Public Defenders
Attorneys for Daniel Rodriguez
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Certificate of Electronic Service

I hereby certify on the 28th day of April 2023 a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

/s/ Cecilia Valencia

Employee of the Federal Public Defender