

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

|                                 |   |
|---------------------------------|---|
| <b>UNITED STATES OF AMERICA</b> | : |
|                                 | : |
| v.                              | : |
|                                 | : |
|                                 | : |
| <b>DEBORAH SANDOVAL</b>         | : |
| <b>SALVADOR SANDOVAL,</b>       | : |
| <b>Defendant.</b>               | : |

**CRIMINAL NO. 21-cr-195**

**CONSENT MOTION TO CONTINUE MOTION DEADLINE AND HEARING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this consent motion to continue the motion hearing currently scheduled for March 23, 2022 and to continue to toll the above-captioned matter through the next motions hearing. In addition, the parties consent to the government having an extension to file its replies to the current motion deadline of February 14, 2022. As grounds for the continuance, the parties note the following:

- 1) Defense counsel for Defendant Salvador Sandoval will be in trial in Iowa on March 22, 2022, which will be continuing for multiple weeks.
- 2) The government is in the process of responding to the motions filed by both defendants, which include issues such as severance, motions in limine regarding videos and text messages, and venue. The undersigned is working diligently on replies.
- 3) No trial date is currently set. Discovery productions across all Capitol cases are ongoing.
- 4) All parties agree to continue the motion hearing date, grant the government

additional time to respond, and to continue to toll the speedy trial clock for the reasons put on the record at the last status hearing.

- 5) The parties have consulted with chambers regarding a new motion hearing date. All parties are available on April 27. The government defers to the court on a deadline for replies, but would ask for a March 15 deadline.

Dated: February 10, 2022

Respectfully submitted,

MATTHEW GRAVES  
ACTING UNITED STATES ATTORNEY

By: /s/ Louis Manzo  
Louis Manzo  
Special Assistant United States Attorney  
Mass Bar: 688337  
555 4th Street, N.W.  
Washington, D.C. 20530  
(202) 262-6570  
Louis.manzo@usdoj.gov

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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| UNITED STATES OF AMERICA | :                        |
|                          | :                        |
| v.                       | : CRIMINAL NO. 21-cr-195 |
|                          | :                        |
| DEBORAH SANDOVAL         | :                        |
| SALVADOR SANDOVAL,       | :                        |
| Defendant.               | :                        |

**ORDER**

This matter having come before the Court pursuant to a Consent Motion to Continue Motion Deadline and Hearing, it is therefore:

ORDERED that the motions hearing is continued until April 27, 2022.

ORDERED that the government shall reply to the defense motions by March 15, 2022

ORDERED that the period from today through the next hearing date shall be excluded from computing the time under the Speedy Trial Act because the ends of justice served by such a continuance outweigh the interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. " 3161(h)(1) & (h)(7). The Court finds that there is voluminous and evolving discovery, and that delay is necessary for the parties to consider resolutions.

It Is So Ordered.

\_\_\_\_\_  
THE HONORABLE THOMAS F. HOGAN  
United States District Court Judge

Entered: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Consent Motion to Exclude Time for Indictment was served upon counsel of record for the defendant through the electronic court filing system, this 10th day of February 2022.

By: /s/ Louis Manzo  
Louis Manzo  
Special Assistant United States Attorney  
Mass Bar 688337  
555 4th Street, N.W.  
Washington, D.C. 20530  
(202) 262-6570  
Louis.manzo@usdoj.gov