

**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)	The Honorable Thomas F. Hogan
SALVODAR SANDOVAL, JR.,)	
Defendant.)	

MOTION TO CONTINUE HEARING

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

1. On February 18, 2021, a complaint was filed against Ms. Sandoval alleging violations of 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, 18 U.S.C. § 1752(a)(2) - Knowingly Impeding or Disrupting the Orderly Conduct of Government, 40 U.S.C. § 5104(e)(2)(D) - Violent Entry and Disorderly Conduct on Capitol Grounds, and 40 U.S.C. § 5104(e)(2)(G) - Violent Entry and Disorderly Conduct on Capitol Grounds (*See* ECF Doc. No. 1).

2. On or about February 25, 2021, Ms. Sandoval was release after processing and to appear before United States Magistrate Judge G. Michael Harvey on April 22, 2021, at 1:00 pm (*See* ECF Doc. No. 11).

3. On March 9, 2021, Ms. Sandoval was charged in a 13-count indictment alleging violations of 18 U.S.C. § 231(a)(3) – Civil Disorder, 18 U.S.C. § 111(a)(1) – Assaulting, Impeding, or Resisting Certain Officers, 18 U.S.C. § 1512(c)(2) – Obstruction of an Official Proceeding, 18

U.S.C. § 1752(a)(1) – Entering and Remaining in a Restrict Building or Grounds, 18 U.S.C. § 1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building or Grounds, 18 U.S.C. § 1752(a)(4) – Engaging in Physical Violence in a Restricted Building or Grounds, 40 U.S.C. § 5104(e)(2)(D) – Disorderly Conduct in a Capital Building, 40 U.S.C. § 5104(e)(2)(F) – Acts of Physical Violence in the Capital Grounds or Buildings, and §40 U.S.C. § 5104(e)(2)(G) – Parading, Demonstrating, or Picketing in a Capital Building.

4. Ms. Sandoval, through previous counsel, filed a Motion to Sever (*See* ECF Doc. No. 42), a Motion in Limine (*See* Doc. No 43), and a Motion to Join and Adopt Co-Defendant’s Motion for Change of Venue (*See* ECF Doc. No. 46).

5. On February 11, 2022, the Court ordered the aforementioned motions to be heard on April 27, 2022, at 10:00 am. (*See* ECF Doc. No. 50).

6. On March 16, 2022, undersigned counsel entered his appearance.

7. Undersigned counsel is currently acquiring/reviewing discovery materials relevant to said motions.

8. On March 31, 2022, undersigned counsel received an email from Assistant United States Attorney Louis Manzo who consented to the relief sought within.

9. On March 31, 2022, undersigned counsel received an email from Co-Defendant’s attorney, Trevor Hook, who consented to the relief sought within.

WHEREFORE, Ms. Sandoval respectfully requests the within Motion to Continue Hearing be granted.

Respectfully submitted,

s/ Komron Jon Maknoon
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PA I.D. No. 90466

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