

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

**UNITED STATES OF AMERICA** )  
 )  
 **v.** ) **Criminal No. 21-88 (DLF)**  
 ) **Judge Friedrich**  
 )  
 **RONALD SANDLIN** )

**UNOPPOSED MOTION TO CONTINUE PLEA HEARING**

COMES NOW the defendant, Ronald Sandlin, by and through undersigned counsel, and respectfully moves this Honorable Court to continue his plea hearing from September 16, 2022 to September 30, 2022 at 2:00 p.m. In support of this motion, Mr. Sandlin would show:

1. A plea hearing is currently scheduled in this case for September 16, 2022 at 10:00 a.m.
2. Due to unforeseen developments involving the United States Marshals Service moving Mr. Sandlin from the D.C. Department of Corrections' Central Treatment Facility to another facility, Mr. Sandlin will not be ready to go forward with the plea hearing on September 16, 2022. Accordingly, Mr. Sandlin moves the Court to continue the hearing to another day.
3. Undersigned counsel has been in contact by e-mail with Assistant United States Attorney Jessica Arco, and Ms. Arco has indicated that the government does not oppose a motion by Mr. Sandlin to continue his plea hearing to a later date.
4. From exchanging e-mails with AUSA Arco and Courtroom Deputy Jonathan Hopkins, undersigned counsel has determined that the parties and the Court are

available to do Mr. Sandlin's plea hearing on September 30, 2022 at 2:00 p.m.

Accordingly, Mr. Sandlin moves the Court to continue his plea hearing until then.

5. Mr. Sandlin agrees to waive his rights under the Speedy Trial Act between September 16, 2022 and September 30, 2022.

WHEREFORE, the defendant, Ronald Sandlin, moves this Honorable Court to continue his plea hearing in this case from September 16, 2022 to September 30, 2022 at 2:00 p.m.

Respectfully submitted,

/s/

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