

**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
SALVADOR SANDOVAL, JR.,)	
Defendant.)	

DEFENDANT’S MOTION TO CONTINUE TRIAL

AND NOW, to-wit, comes the defendant, Deborah Sandoval (hereinafter “Ms. Sandoval”), by and through her counsel, Komron Jon Maknoon, Esquire, and respectfully files this Motion to Continue Trial. In support thereof, she states 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 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 (*See* ECF Doc. No. 19).

3. On March 16, 2022, undersigned counsel respectfully entered his appearance (*See* ECF Doc. No. 54).

4. Currently scheduled is:

a. Trial – December 12, 2022, at 9:30am

5. After reviewing his calendar, undersigned counsel discovered a conflict between this case and another case scheduled for trial in December 2022 (*United States v. Richardson*, 3:17-cr-00024).

6. The defendant in the above-referenced case is currently incarcerated, and his case pre-dates the COVID-19 pandemic.

7. Additionally, undersigned counsel was recently informed of voluminous additional discovery uploads for non-incarcerated clients charged in cases originating from the events on January 6, 2021.

8. On June 10, 2022, undersigned counsel spoke to Assistant United States Attorney Louis Manzo, who stated no objection to the relief sought within this motion.

9. On June 12, 2022, undersigned counsel spoke to counsel for co-defendant Salvador Sandoval, Jr., who stated no objection to the relief sought within this motion.

WHEREFORE, Defendant Deborah Sandoval respectfully moves the Court to continue the trial until the end of January 2023 trial term.

Respectfully Submitted,

s/ Komron Jon Maknoon

Komron Jon Maknoon, Esquire
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