

**SUPERIOR COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. 1-21-cr-00722-2 (TFH)
 :
 MARYANN MOONEY-RONDON :
 :
 _____ :
 :

**CONSENT MOTION TO CONTINUE STATUS HEARING
AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

Maryann-Rooney Rondon, with the consent of the other parties, hereby move this Court to continue the scheduled status hearing in the above-captioned proceeding, and further to exclude the time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161. In support of this motion, the parties state as follows:

1. Ms Mooney-Rondon is before the Court charged by Indictment with one count each of; Obstruction of an Official Proceeding in violation of 18 U.S.C. §§ 1512(c)(2), 2; Theft of Government Property in violation of 18 U.S.C. §§641, 2; Entering and Remaining in a Restricted Building or Grounds in violation of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of 18 U.S.C. § 1752 (a)(2); Entering and Remaining in the Gallery of Congress in violation of 40 U.S.C. § 5104(e)(2)(B); Entering and Remaining in Certain Rooms in the Capitol Building in violation of 40 U.S.C. § 5104(e)(2)(C); Disorderly Conduct in a Capitol Building in violation of 40 U.S.C. § 5104 (e)(2)(D); and Demonstrating or Picketing in a Capitol

Building in violation of 40 U.S.C. § 5104 (e)(2)(G). A status hearing is currently set for Thursday 11th August, 2022.

2. Undersigned counsel was only recently appointed to this matter. Discovery is still in the process of being provided and as such counsel has not had an opportunity to review and discuss the case with Ms Mooney-Rondon. Additionally, counsel has only recently become aware of a potential disposition alternative short of trial. Again, given the short amount of time counsel has been involved, meaningful discussions both with client and government have only just begun. A continuance is necessary for counsel to become appropriately familiar with the case.
3. The parties have discussed a new hearing date. The parties agree a 60-day time frame is appropriate. The parties are all available 6th October for a new status date. However, if the Court is not available that date, the parties are still available on 11th August to schedule a date available to all.
4. Ms Mooney-Rondon agrees that the time limits mandated by 18 U.S.C. § 3161 are tolled for the period between the current status hearing and the date agreed upon for the next hearing. Co-defendant Rafael Rondon also agrees to the tolling of Speedy Trial Act time.
5. The government has no objection to this request. Counsel has reached out to Mr Rondon's attorney, Nathaniel Silver. Mr Silver agrees to this request.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Consent Motion to Continue Status Hearing in the above-captioned proceeding.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Consent Motion to Continue Status Hearing and to Exclude Time Under the Speedy Time Act is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 9th day of August, 2022.

/s/ Peter A. Cooper

Peter A. Cooper