

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America )  
 )  
 v. ) USDC No. 22-cr-722-01 (JMC)  
 )  
 Rafael Rondon, *defendant* )

JOINT MOTION TO CONTINUE SENTENCING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, moves the Court jointly with the United States, to continue the sentencing from March 13, 2023, at 3 o’clock p.m., until a date no earlier than during the week of June 12, 2023, for the following reason.

1. The defendant entered a plea of guilty to one (1) count of Obstruction under 18 U.S. §1512. His sentencing was scheduled for March 13, 2023.
2. The defendant is enrolled in an 18-month long program in welding, leading to certification, at Florida’s Indian River State College. He will complete the program by the beginning of June, 2023.
3. It is important to the defendant to complete the program before he begins to serve any sentence of incarceration. He has invested his time and effort in participating in the program, while his family has provided financial assistance to him. The government recognizes the importance to the defendant, who matriculated into this program with the permission of this Court’s predecessor, Hon. Thomas F. Hogan, while this case was pending, who approved defendant’s move to Florida from New York in order to take advantage of this opportunity.

4. The defendant has complied with the terms of his pretrial release.<sup>1</sup>

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Will Widman, Esq., U.S. Dept. of Justice, attorney of record for the government in the instant case, this 31st day of January, 2023.

/s/

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*Nathan I. Silver, II*

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<sup>1</sup> There was one violation raised in this case, though the defendant was indirectly, not directly, its subject, having to do with the surrender of firearms by the defendant's mother, codefendant Maryann Mooney-Rondon. No action was taken by the Court regarding that issue.