

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)
)
 v.) USDC No. 21-cr-722-01 (JMC)
)
 Rafael Rondon, *defendant*)

UNOPPOSED MOTION TO CONTINUE SENTENCING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, with no opposition from the United States, moves the Court to continue the in-person sentencing from July 5, 2023, at 10:30 a.m., to July 17, 2023 at 10 a.m. for the following reason.

The defendant’s mother and codefendant, Maryann Mooney-Rondon, is scheduled for sentencing on July 17, 2023. Both defendants have entered guilty pleas, though Ms. Mooney Rondon stipulated to a trial and entered a plea of guilty that will allow her to challenge on appeal her conviction. Much of the conduct alleged by the government and admitted by the defendants was very similar, if not identical. In that light, the Court might be able to conduct more efficiently both sentencings at a single hearing than if they were done separately.

On a personal level, in these circumstances, especially since the sentencings are scheduled in person, it will be reassuring to the defendant to be present with his mother at her sentencing. Both will be coming from out-of-town, the defendant likely from Florida, where he resides, his mother from upstate New York.

Counsel informed asst. U.S. Attorney Will Widman, attorney of record for the government, of this request. The government does not oppose. Counsel called and left a

voicemail message for Peter Cooper, Esq., attorney for the codefendant, on May 24, 2023. As of the time of this filing, counsel has not received a response.

In the circumstances, the defendant moves the Court to continue the sentencing to July 17, 2023 at 10 o'clock a.m.

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 assistant U.S. Attorneys Will Widman, Esq. attorney of record for the government, and Peter Cooper, Esq., this 26th day of May, 2023.

/s/

Nathan I. Silver, II