

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1-21-cr-722-1 (JMC)
	:	
MARYANN MOONEY-RONDON	:	
	:	
_____	:	

CONSENT MOTION TO CONTINUE SENTENCING

Maryann Mooney-Rondon hereby moves this Court for a continuance of sentencing in the above-captioned proceeding. In support of this motion, Ms Mooney-Rondon states as follows:

1. Maryann Mooney-Rondon is before the Court pending sentencing with violations of one count each of: Obstruction of an Official Proceeding and Aiding and Abetting in violation of 18 U.S.C. §1512 (c)(2), §841(b)(1)(C), and Theft of Government Property in violation of 18 U.S.C. §641. Sentencing is currently set for 17 July, 2023.
2. Due to various scheduling issues, undersigned counsel and the assigned U.S. Probation Officer have been unable to schedule the pre-sentence report interview in such a manner as to meet the current deadlines. A continuance would allow the parties additional time to conform with requirements.
3. Government counsel has been consulted on this Motion. The government consents to this Motion. Additionally, counsel for Ms Mooney-Rondon's co-defendant, Rafael Rondon, also consents to this request. Mr Rondon's counsel also requests the Court schedule Mr Rondon's sentencing to the same date as Ms Mooney-Rondon's.

WHEREFORE, for the above reasons, the parties respectfully request that this Court grant this Motion to continue the currently scheduled sentencing hearing in the above-captioned proceeding.

Respectfully Submitted,

/s/ Peter A. Cooper

Peter A. Cooper, (#478-082)
400 Fifth Street, NW.
Suite 350
Washington DC 20001
pcooper@petercooperlaw.com
Counsel for Maryann Mooney-Rondon

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Consent Motion to Continue Sentencing is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record and co-defendant counsel this 8th day of June, 2023.

/s/ Peter A. Cooper

Peter A. Cooper