

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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

CONSENT MOTION TO CONTINUE SENTENCING

Defendant, through undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court under the Criminal Justice Act, respectfully moves the Court, with the consent of the United States, to continue the sentencing set for July 5, 2023 at 10:30 a.m. until Tuesday, September 12, 2023 at 10:30 a.m. for the reason that follows.

Defendant seeks to consolidate his sentencing with that of his mother and codefendant, Maryann Mooney-Rondon. On May 30, 2023, the Court granted defendant’s unopposed motion to continue his sentencing from July 5, 2023, to July 17, 2023, the date of his mother’s sentencing. Since then it became apparent that the codefendant and the U.S. Probation Office would need additional time for the completion of the presentence investigation and the submission of the report (PSR). Defendant incorporates by reference his representations from his previously-filed Unopposed Motion. (ECF Doc. 61)

A proposed Order is attached.

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

This pleading is,

Respectfully submitted,

/s/

NATHAN I. SILVER, II

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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., USDOJ-CRM, attorney of record for the government in the instant case, and Peter A. Cooper, Esq., attorney for codefendant, this 8th day of June, 2022.

/s/

Nathan I. Silver, II