

**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 ENLARGE TIME
FOR SENTENCING MEMORANDUM SUBMISSION**

Maryann-Rooney Rondon, through counsel and with the consent of the United States, hereby move this Court to the time due for sentencing memorandum. In support of this motion, undersigned counsel states as follows:

1. Ms Mooney-Rondon is before the Court pending sentencing with one count each of; Obstruction of an Official Proceeding in violation of 18 U.S.C. §§ 1512(c)(2), and Theft of Government Property in violation of 18 U.S.C. §§641. Sentencing is set for Thursday 12th September, 2023. A due date of 29 August is set for sentencing memoranda.
2. In the past few days, unexpected occurrences in counsel’s other matters and case-load have prevented satisfactory completion of sentencing memorandum on behalf of Ms Rooney-Rondon. Counsel requests a brief enlargement to complete his memorandum. Specifically, counsel is requesting Tuesday 5th September as a new date.
3. Counsel has conferred with the assigned AUSA, Will Widman. Mr Widman has no objection 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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Counsel for Maryann Mooney-Rondon

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Consent Motion to Enlarge Time for Submission of Sentencing is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 29th day of August, 2023.

/s/ Peter A. Cooper

Peter A. Cooper