

Ehrgood & Arnold  
Ian M. Ehrgood, Esquire  
Attorney ID No. 313850  
410 Chestnut St.  
Lebanon, PA 17042  
717-274-5641  
717-272-0670 fax  
imehrgood@gmail.com

*Attorney for Veronika C. Rodriguez, Defendant*

ENTERED & FILED  
CLERK OF COURTS  
LEBANON, PA

2023 SEP 29 12:06

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA : IN THE COURT OF COMMON PLEAS OF  
vs. : LEBANON COUNTY, PENNSYLVANIA  
: CRIMINAL DIVISION  
:   
VERONIKA C. RODRIGUEZ : ACTION NO. CP-38-CR-430-2023

**MOTION FOR THIRD CONTINUANCE**

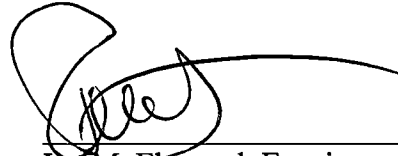
AND NOW, comes the Defendant, Veronika C. Rodriguez, by and through her attorney Ian M. Ehrgood, Esquire, and respectfully moves for a continuance as follows:

1. Defendant is charged with two counts of intercept communications and one count of false reports in a Complaint dated March 8, 2023.
2. Defendant is scheduled for Call of the List on October 3, 2023.
3. Defendant is not ready to proceed with her case.
4. Defendant is in the process of obtaining an expert report and intends to present expert testimony at trial. Defendant needs additional time to obtain said report.
5. Two prior continuance requests have been filed by Defendant.
6. Defendant requests that this case be continued to the December 5, 2023 Call of the List and the December 18, 2023 trial term.
7. Defendant waives her rights under the Federal and State Constitutions and Pa.R.Crim.P. Rule 600 in requesting this continuance.

8. Kevin M. Dugan, Esquire, Senior Deputy District Attorney, has been consulted regarding this motion and the purpose therein and has indicated that the Commonwealth has no objection to Defendant's continuance request.

WHEREFORE, Defendant prays your Honorable Court to grant her a continuance to December 5, 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ian M. Ehrgood', is written over a horizontal line.

Ian M. Ehrgood, Esquire

By my above signature, I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

# ORIGINAL

COMMONWEALTH OF PENNSYLVANIA : IN THE COURT OF COMMON PLEAS OF  
vs. : LEBANON COUNTY, PENNSYLVANIA  
: CRIMINAL DIVISION  
:   
VERONIKA C. RODRIGUEZ : ACTION NO. CP-38-CR-430-2023

## **ORDER OF COURT**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, in consideration of the foregoing request for continuance and finding as a fact that the above-captioned defendant has knowingly and willing waived her rights to a speedy trial under Pa.R.Crim.P. Rule 600, the above case is hereby continued to the December 5, 2023 Call of the List and the December 18, 2023 Trial Term.

BY THE COURT,

\_\_\_\_\_, J.

### **Distribution:**

District Attorney (KMD)  
Ian M. Ehrgood, Esq.