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CLERK OF COURTS
LEBANON, PA

2024 JUN 28 P 12:33

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

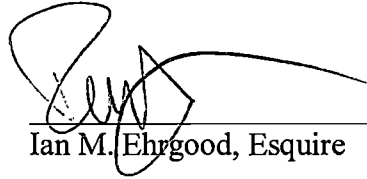
MOTION FOR CONTINUANCE

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 July 2, 2024.
3. Defendant previously filed a Certificate of Trial Readiness for the April 2024 trial term as she and her expert witnesses were ready and available.
4. The Commonwealth continued the above-captioned action to its currently scheduled dates.
5. Defendant's experts, Dr. Sheri Vanino and Carlton R. Hershman are both unavailable for the July 2024 trial term.
6. Four prior continuance requests have been filed by Defendant.
7. Defendant requests that this case be continued to the August 6, 2024 Call of the List and the August 26, 2024 trial term.
8. Defendant waives her rights under the Federal and State Constitutions and Pa.R.Crim.P. Rule 600 in requesting this continuance.

WHEREFORE, Defendant prays your Honorable Court to grant her a continuance to the August 6, 2024 Call of the List and the August 26, 2024 trial term.

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.

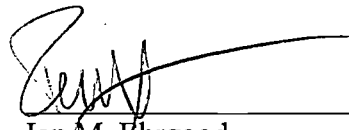
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CERTIFICATE OF SERVICE

I, Ian M. Ehrgood, Esquire, HEREBY CERTIFY that on the 28th day of June, 2024, I served a true and correct copy of the foregoing ORDER OF COURT and MOTION FOR CONTINUANCE filed to the above number and term, to:

District Attorney's Office
Via interoffice mail



Ian M. Ehrgood

ORIGINAL

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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 willingly waived her rights to a speedy trial under Pa.R.Crim.P. Rule 600, the above case is hereby continued to the August 6, 2024 Call of the List and the August 26, 2024 Trial Term.

BY THE COURT,

_____, J.

Distribution:

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