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ENTERED & FILED
CLERK OF COURTS
LEBANON, PA

2023 DEC -1 P 12: 27

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

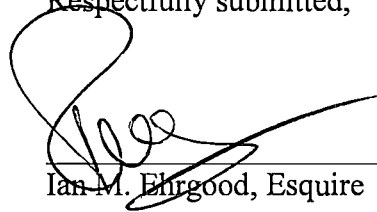
MOTION FOR FOURTH CONTINUANCE

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 December 5, 2023.
3. Defendant is not ready to proceed with her case.
4. Defendant's expert witness is attached to other trials and is not available until the April 2024 trial term.
5. Three prior continuance requests have been filed by Defendant.
6. Defendant requests that this case be continued to the April 2, 2024 Call of the List and the April 22, 2024 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. The District Attorney's office has consented to an additional continuance due to expert witness unavailability.

WHEREFORE, Defendant prays your Honorable Court to grant her a continuance to April 2, 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ian M. Elrgood', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail that extends to the right.

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 1st day of December, 2023, 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

Ehrgood & Arnold
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ORIGINAL

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vs.	: 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 willingly waived her rights to a speedy trial under Pa.R.Crim.P. Rule 600, the above case is hereby continued to the April 2, 2024 Call of the List and the April 22, 2024 Trial Term.

BY THE COURT,

_____, J.

Distribution:

District Attorney

Ian M. Ehrgood, Esq.