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



TERED & FILED ERK OF COURTS LEBANON, PA

2025 JAN 31 P 3:57

COMMONWEALTH OF PENNSYLVANIA

: IN THE COURT OF COMMON PLEAS OF

: LEBANON COUNTY, PENNSYLVANIA

: CRIMINAL DIVISION

VERONIKA C. RODRIGUEZ

VS.

: ACTION NO. CP-38-CR-430-2023

## MOTION FOR DATE CERTAIN

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

- 1. The Court has advised the Commonwealth and the Defendant that it is available for criminal jury trials in the months of February, April, and May.
- 2. The Commonwealth is available for the February and May trial terms.
- 3. The Defendant is available for the April and May trial terms.
  - 4. The Commonwealth and the Defendant are seeking a date certain for the trial in this matter.

WHEREFORE, Defendant prays your Honorable Court to schedule the trial in this matter for a date certain in the May 2025 trial term.

Respectfully submitted,

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.

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

COMMONWEALTH OF PENNSYLVANIA

: IN THE COURT OF COMMON PLEAS OF

: LEBANON COUNTY, PENNSYLVANIA

vs. : CRIMINAL DIVISION

VERONIKA C. RODRIGUEZ

: ACTION NO. CP-38-CR-430-2023

## **CERTIFICATE OF SERVICE**

I, Ian M. Ehrgood, Esquire, attorney for the Defendant, hereby certify that I served a true and correct copy of the foregoing Motion upon the Commonwealth via interoffice mail this date.

January 31, 2025

Ian M. Ehrgood

commonwealth of Pennsylvania vs.	: IN THE COURT OF COMMON PLEAS OF : 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 Motion for Date Certain, this matter is scheduled for trial	
beginning May, 2025.	
This case shall be listed for the May 6, 2026 Call of the List.	
	·.
·	
	BY THE COURT,
	•
	Charles T. Janes, Jr.
	Charles T. Jones, Jr.

<u>Distribution:</u> District Attorney (ASM) Ian M. Ehrgood, Esq.