

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

|                                 |   |                        |
|---------------------------------|---|------------------------|
| <b>UNITED STATES OF AMERICA</b> | : | <b>1:21-CR-234-CJN</b> |
|                                 | : |                        |
| v.                              | : |                        |
|                                 | : |                        |
| <b>JOSEPH W. FISCHER,</b>       | : |                        |

**MOTION FOR EXTENSION OF TIME**  
**TO FILE BRIEF IN OPPOSITION**

Joseph W. Fischer, by and through his attorneys, requests that this Court grant his Motion for Extension of Time to File Brief in Opposition. In support of this Motion, counsel states the following facts.

1. On March 15, 2022, this Court issued a memorandum and order, granting in part defendant's Motion to Dismiss Counts 1, 3, 4 and 5 of the superseding indictment in this matter and dismissing Count 3 without prejudice (ECF Nos. 64 & 65).
2. On April 8, 2022, the government filed a Motion for Reconsideration of the Court's Ruling Dismissing Count 3 of the Indictment (ECF 72).
3. Undersigned counsel's brief in opposition to the government's Motion for Reconsideration is due April 22, 2022.
4. Given undersigned counsel's current workload, it is respectfully requested that the deadline for filing a brief in opposition in this matter be extended by one week, until April 29, 2022.

5. The Government has concurred in the relief sought in this motion.

### CONCLUSION

For the reasons set forth hereinabove, the defendant, Joseph W. Fischer, respectfully requests that this Honorable Court grant the foregoing motion for extension to file brief in opposition.

Date: April 19, 2022

Respectfully submitted:

/s/ Lori J. Ulrich

LORI J. ULRICH, ESQUIRE  
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/s/ Amanda R. Gaynor

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## CERTIFICATE OF SERVICE

I, Lori J. Ulrich, Esquire, of the Federal Public Defender's Office, do hereby certify that I served a copy of the foregoing **Motion for Extension of Time to File Brief in Opposition** via Electronic Case Filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

ALEXIS JANE LOEB, ESQUIRE  
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JOSEPH W. FISCHER

Date: April 19, 2022

*/s/ Lori J. Ulrich*  
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