

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 SEAN MICHAEL MCHUGH, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

Case No. 21-CR-453 (JDB)

**DEFENDANT’S MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS IN  
LIMINE**

**COMES NOW** Defendant, Sean Michael McHugh (Mr. McHugh) by and through his counsel of record, Joseph W. Allen, and in keeping with Rule 12(b) respectfully tenders his Motion for Leave to File Additional Motions in Limine and in support thereof states as follows:

1. On February 10, 2022, this Court made and entered its order regarding the timing for filing motions in limine.
2. Per the Court’s Order, motions in limine were to be presented prior to any other trial related motions or disclosures.
3. Since that time, the Government has, in keeping with the schedule imposed by this Court, disclosed certain facts which they will seek to introduce as evidence at trial.
4. Certain of these were not anticipated by Counsel for the Defendant and therefore it is necessary that a Second Omnibus Motions in Limine be filed to address aspects of these recent disclosures.

**WHEREFORE** Defendant respectfully prays this Court find that good cause has been shown as to why Mr. McHugh should be permitted to file his Second Omnibus Motions in

Limine, and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,



---

Joseph W. Allen, MO BAR #57669  
1015 W. State Hwy. 248 Ste. I  
Branson, MO 65616  
Telephone: 417/334-6818  
Facsimile: 417/612-7081  
joe@mybransonattorney.com  
**Attorney for Defendant**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of March 2023, I filed the foregoing Motion to File Out of Time and a proposed Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.



---

Joseph W. Allen

