

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
Case No.: 21-CR-026 (CRC)**

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 21-cr-026 (CRC)

CHRISTOPHER MICHAEL ALBERTS
Defendant.

ALBERTS MOTION FOR AN ADDITIONAL 14 DAYS TO FILE MOTIONS FOR RULE 29
MOTIONS FOR ACQUITTAL AND RULE 33 MOTIONS FOR NEW TRIAL

COMES NOW, Defendant, CHRISTOPHER MICHAEL ALBERTS, (hereinafter, “Defendant” or “Alberts”), by and through undersigned counsel, with this motion for an enlargement of time—an additional 14 days—to file motions for new trial and/or for acquittal.

Alberts was convicted on April 24 by a jury of nine of nine criminal counts. The Federal Rules provide for a very narrow time period for moving for new trial and/or for acquittal notwithstanding the verdict. Rule 29 (c) provides that motions for acquittal must be filed within 14 days after judgment of conviction. Additionally, Rule 33 also provides 14 days to file a motion for new trial.

Alberts requests an additional 14 days to file these post-conviction motions, so that these motions will be due by midnight on **May 18**.

The defense has reached out to the United States very recently via email. But as of the time of filing this motion, we have not heard back from them.

Dated: May 3, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce
John Pierce Law Firm
21550 Oxnard Street
3rd Floor, PMB #172
Woodland Hills, CA 91367
Tel: (213) 400-0725
Email: jpierce@johnpiercelaw.com

/s/ Roger I. Roots

Roger I. Roots
John Pierce Law Firm
21550 Oxnard Street
3rd Floor, PMB #172
Woodland Hills, CA 91367
Email: rroots@johnpiercelaw.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, May 3, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce