## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

\*

v. \* CASE NO: 21-CR-0175-3 (TJK)

\*

ZACHARY REHL,

Defendant

\*\*\*\*\*\*

## MOTION FOR A SHORT EXTENSION TO FILE ADDITIONAL MOTIONS

Zachary Rehl, by his undersigned counsel, hereby respectfully moves this Honorable Court for a 3-day extension to file additional motions.

- 1. Despite due diligence, counsel requires additional time to file Rule 12(b) motions.
- 2. At the moment, counsel has an extremely heavy caseload. Among other matters, counsel is scheduled to start a multi-defendant complex case on September 19, 2022. Counsel has been required to devote substantial time to evidentiary hearings and other pretrial issues in the the case. Other matters with equally pressing deadlines have also required counsel's attention.
- 3. In addition, due to health reasons, counsel has had to catch up on a number of matters and has been limited in the number of hours she has been able to devote to work.

WHEREFORE, counsel respectfully requests an additional three days to file Rule 12(b) motions.

Respectfully submitted,

/s/

Carmen D. Hernandez

Bar No. MD03366 7166 Mink Hollow Road Highland, MD 20777 (240) 472-3391; (301) 854-0076 (fax)

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY	that a copy of the	foregoing was	served via	ECF on	all c	ounsel o	)f
record this 19th day of August,	2022						

/s/ Carmen D. Hernandez Carmen D. Hernandez