

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 1:21-CR-222 (TFH)

GEORGE PIERRE TANIOS,

Defendant.

DEFENDANT'S MOTION TO PERMIT ADDITIONAL MOTIONS

The Defendant, George Pierre Tanios, by and through counsel, moves for permission to file additional motions after February 24, 2022, which is the deadline for motions. This is a complex case. Discovery is being disclosed by the Government on a regular basis. Our investigation is in progress and our legal research is ongoing. With trial scheduled in June 2022, it is possible that we will identify other relevant motions as we move forward, including but not limited to motions in limine, which become apparent typically after learning more about the government's witnesses, exhibits and theories for trial. Accordingly, undersigned counsel respectfully requests an opportunity in the future to file any additional motions if deemed necessary and appropriate.

Respectfully submitted,

GEORGE PIERRE TANIOS

By: /s/ Elizabeth B. Gross

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CERTIFICATION OF SERVICE

I hereby certify that on February 24, 2022, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia and a copy will be sent to the following:

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