

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Case No.: 21-CR-026 (CRC)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER MICHAEL ALBERTS

Defendant.

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**SECOND MOTION FOR EXTENSION TO SUBMIT A REPLY OR  
ALTERNATIVELY REQUEST TO SUBMIT A REPLY UNTIMELY**

COMES NOW, Defendant, CHRISTOPHER MICHAEL ALBERTS, (hereinafter, "Defendant" or "Mr. Alberts"), by and through undersigned counsel, respectfully requests the Court permit Defendant an additional seven (7) days to Reply to the United States of America's Response in Opposition (D.E. 52) to Defendant's Motion to Dismiss (D.E. 40) or to submit a reply untimely based off the Court's latest order and states:

**DISCUSSION**

1. On February 10, 2022, Defendant filed a Motion to Dismiss (D.E. 40).

2. On May 19, 2022, the United States submitted an Opposition to Defendant's Motion to Dismiss (D.E. 52).

3. On May 24, 2022, Defendant filed a motion seeking an additional seven (7) days to file a reply which graciously, the United States did not oppose and the Court granted.

4. Unfortunately, shortly after the granting of Defendant's motion, undersigned became very ill, tested positive for COVID-19, and ultimately went to the hospital. To date, undersigned remains ill.

5. Defendant desires to submit a Reply to the United States Opposition; and is humbly requesting an additional seven (7) days to submit same.

6. This motion is made in good faith and not for purposes of delay.

**WHEREFORE**, Defendant respectfully request a seven (7) day extension up and through June 13, 2022, to file a Reply to the United States Response in Opposition (D.E. 52) to Defendant's Motion to Dismiss (D.E. 40); or alternatively, an opportunity to submit a reply untimely post the Court's latest order and anything further the Court deems just and proper under the circumstances.

Respectfully Submitted,

**FERGUSON LAW, P.A.**

Attorney for Defendant

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*/s/ Kenneth W. Ferguson*

Kenneth W. Ferguson, Esq.

~Psalm 23~

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of June, 2022, a copy of the foregoing was efiled, served, and/or delivered to counsel of record or case registered parties by the CM/ECF court system.

**FERGUSON LAW, P.A.**

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