

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

ROBERT GIESWEIN,

Defendant.

Crim. Action No. 21-24-1 (EGS)

**MOTION FOR LEAVE TO FILE REPLY BRIEFS OUT OF TIME**

Mr. Gieswein, through undersigned counsel, respectfully requests that this Court permit counsel to file four reply briefs in support of his Rule 12 motions a few hours late, that is, in the early morning hours of January 11, 2022, rather than on January 10, 2022. Mr. Gieswein states the following in support of his motion:

1. The replies were due on January 10, 2022. *See* Dec. 23, 2021 Minute Entry.
2. The defense worked diligently to meet the Court's deadline, but undersigned counsel was not able to finalize the brief until past midnight on January 10.
3. The proffered reply briefs are attached hereto as Exhibits 1-4. Exhibits to the fourth reply are also filed herewith, as exhibits 5-10.
4. As the government will have access to the brief within hours after the original deadline, and the hearing on the motion is eight days off, permitting counsel to file the reply late will not prejudice the government.

5. Undersigned counsel conferred with counsel for the government, and is authorized to represent that the government does not oppose this motion.

Accordingly, Mr. Gieswein, through undersigned counsel, respectfully requests that this Court grant him leave to file his motion later than ordered. For the Court's convenience, a proposed Order is submitted with this Motion.

Respectfully submitted on January 11, 2022.

**ROBERT GIESWEIN**

by counsel:

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Federal Public Defender

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