

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

<b>UNITED STATES OF AMERICA</b>	:	<b>1:21-CR-234-CJN</b>
	:	
v.	:	
	:	
<b>JOSEPH W. FISCHER,</b>	:	

**MOTION TO EXTEND DEADLINE TO FILE REPLY**

Joseph W. Fischer, by and through his attorneys, requests that this Court grant his Motion to Extend Deadline to file a Reply. In support of this Motion, counsel states the following facts.

1. Mr. Fischer is charged in a seven-count superseding indictment with, *inter alia*, civil disorder in violation of 18 U.S.C. § 231(a)(3) (Count One), assaulting, resisting and impeding certain officers in violation of 18 U.S.C. § 111(a)(1) (Count Two), obstruction of an official proceeding in violation of 18 U.S.C. § 1512(c)(2) (Count Three), entering and remaining in a restricted building or grounds in violation of 18 U.S.C. § 1752(a)(1) (Count Four), and disorderly and disruptive conduct in a restricted building or grounds in violation of 18 U.S.C. § 1752(a)(2) (Count Five). All of the charges against Mr. Fischer arise out of the events that took place at the United States Capitol on January 6, 2021. ECF#52.

2. On August 4, 2023, Mr. Fischer filed a Motion to Modify Conditions of Pretrial Release. ECF#89.

3. On August 25, 2023, the Government filed an Opposition to Mr. Fischer's Motion to Modify Conditions of Pretrial Release. ECF#91.

4. A reply to the Government's Opposition is due on or before September 1, 2023. Mr. Fischer needs additional time to file a reply to address the Government's arguments.

5. The Government has concurred in the relief sought in this motion.

### CONCLUSION

For the foregoing reasons, the defendant, Joseph W. Fischer, respectfully requests that this Honorable Court grant the foregoing motion to extend deadline to file a reply and that the Court order the reply be due on September 18, 2023.

Date: August 29, 2023

Respectfully submitted:

/s/ Lori J. Ulrich

LORI J. ULRICH, ESQUIRE  
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/s/ Amanda R. Gaynor

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**CERTIFICATE OF SERVICE**

I, Lori J. Ulrich, Esquire, of the Federal Public Defender's Office, do hereby certify that I served a copy of the foregoing **Motion to Extend Deadline to File Reply** via Electronic Case Filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

ALEXIS JANE LOEB, ESQUIRE  
Assistant United States Attorney  
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JOSEPH W. FISCHER

Date: August 29, 2023

*/s/ Lori J. Ulrich*  
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