

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

UNITED STATES OF AMERICA,)	
)	
v.)	
)	CRIM NO. 21-CR-128
SANDRA PARKER,)	Judge: Mehta
)	

UNOPPOSED MOTION FOR LEAVE TO FILE
MOTION FOR NEW TRIAL OR
MOTION FOR JUDGMENT OF ACQUITTAL
OUT OF TIME

COMES NOW counsel for Defendant Sandra Parker, and moves for leave to file its motion for new trial or motion for judgment of acquittal out of time. As reasons therefor, defendant states as follows:

1. Sandra Parker is before the Court for sentencing having been found guilty of counts 1, 2, 3, 4, 5, and 7 of the Indictment.
2. The Court had set a filing schedule for the filing of any post-trial motions in this matter by May 17, 2023, and was further extended to May 29, 2023.
3. Due to trial preparation and trials in multiple cases, counsel was unable to meet the Court’s deadline. Accordingly, Ms Parker’s Motion for New

Trial or Motion for Judgment of Acquittal is to be filed today along with this Motion for Leave to Late File.

3. Counsel has conferred with AUSA Kathryn Rakoczy, who has indicated that the government does not oppose late filing of this motion, provided that defendant Sandra Parker does not have any objection to any reciprocal request should the need arise. Defendant Sandra Parker will not oppose such a request at that time.

WHEREFORE, for the reasons stated above, Defendant Sandra Parker requests that this motion be trial and that the court grant a new trial.

Respectfully submitted,

SANDRA PARKER

/s/John L. Machado
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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 7th day of June, 2021, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado

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