

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

UNITED STATES OF AMERICA)
)
 v.)
)
 LAURA STEELE)
 _____)

CASE NO. 1:21-cr-00028-7-APM

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

Laura Steele, through undersigned counsel, respectfully requests an extension to file pretrial motions in the present matter. Ms Steele requests the Court reset the date due for motions filed in this matter to 31 January, 2022. In support of this Motion, Ms Steele states the following:

1. Discovery in this matter continues to be an ongoing process with material still being provided along with the Evidence.com database now being made available.
2. The voluminous nature of the discovery in this matter requires extensive and time-consuming review.
3. Due diligence requires that discovery be reviewed adequately prior to motions being researched and prepared. This cannot happen while the discovery process remains ongoing.
4. Counsel has communicated with Assistant United States Attorney Jeffrey Nestler who does not oppose this motion.

WHEREFORE, based on the forgoing, counsel for Laura Steele respectfully requests that this Court grant a grant an extension of the deadline for filing pretrial motions until January 31st, 2022.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Unopposed Motion for Enlargement of Time to File Pretrial Motions is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 5th day of January, 2022.

/s/ Peter A. Cooper

Peter A. Cooper