

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

UNITED STATES OF AMERICA

v.

**PAULINE BAUER,
Defendant**

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Case No. 21-cr-0386-2 (TNM)

**CONSENT MOTION TO EXTEND TIME
FOR FILING REPLY**

Pauline Bauer, by her undersigned stand-by counsel, respectfully moves this Honorable Court for a one-week extension to file a Reply to the Government's Opposition to her Motion to Dismiss (ECF 86). AUSA James Peterson consents to this request.

1. Due to the press of other matters and despite due diligence, counsel requires additional time to file a Reply.

2. Counsel's current caseload is extraordinarily heavy. Among other matters, this month, counsel has been preparing pretrial motions in two multi-defendant complex cases with upcoming trials; has filed sentencing memoranda in three separate cases; has appeared at several sentencing and other hearings; and has had a number of meetings with clients and prosecutors.

3. In addition, the issues to be addressed in the Reply are complex and require additional time to review recent legal developments and prepare an adequate reply.

WHEREFORE, Ms. Bauer, through undersigned stand-by counsel, respectfully requests that this Honorable Court extend the deadline for filing a reply for one-week to February 4, 2022.

Respectfully submitted,

/s/ Carmen D. Hernandez

Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that the instant Motion was served this 28th day of January, 2022 via ECF on all counsel of record.

/s/ Carmen D. Hernandez

Carmen D. Hernandez