

**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 VACATE TRIAL DATE

Pauline Bauer, by her undersigned stand-by counsel, hereby respectfully moves to vacate the trial date scheduled in this case for July 5, 2022. The basis for her request is that she requires additional time to review the extensive discovery produced in this case as well as to prepare for trial. AUSA James Peterson consents to this request.

1. Ms. Bauer is representing herself in the instant case. As she is not an attorney, preparation for trial is more difficult and onerous than it would be for an experienced attorney.

2. The discovery in this case, which arises out of the events at the United States Capitol on January 6, is extraordinarily voluminous. *See* Gov Memo Regarding Status of Discovery (ECF 111) at 15-17 (the “amount of information and evidence involved is unprecedented”).

3. For example, “just over 24,000 files consisting of USCP closed circuit video (“CCV”) footage, BWC from multiple law enforcement agencies, and USSS surveillance footage have been made available to the defense instance of evidence.com. For context, the files provided via evidence.com amount to over nine terabytes of information and would take 102 days to view.” *Id.* at 3. Not included in the above-noted volume of materials are reports of investigation, other documents, public source videos and other information obtained from Ms. Bauer’s personal devices and those of other defendants.

4. Moreover, notwithstanding the steps taken by the Department of Corrections and the government to facilitate Ms. Bauer's access to discovery, there are additional burdens and delays attendant to having to prepare for trial while detained and in light of the constraints imposed by COVID procedures.

5. AUSA James Peterson has informed undersigned counsel that he consents to this request.

WHEREFORE, for these reasons, Ms. Bauer respectfully requests that this Honorable Court vacate the July 5 trial date to a later date.

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 18th day of May, 2022 via ECF on all counsel of record.

/s/ Carmen D. Hernandez

Carmen D. Hernandez