

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

UNITED STATES OF AMERICA,)	Docket No. 1:21-cr-00386
)	
)	
v.)	ELECTRONICALLY FILED
)	
)	
PAULINE BAUER,)	The Honorable Trevor N. McFadden
)	
Defendant.)	

**MOTION FOR EXTENSION OF TIME TO FILE OPPOSITIONS TO TRIAL
MOTIONS**

AND NOW, to-wit, comes Defendant, Pauline Bauer (hereinafter “Ms. Bauer”), by and through her attorney, Komron Jon Maknoon, Esquire, and respectfully submits this Motion for Extension of Time to File Oppositions to Trial Motions and, in support thereof, avers as follows:

1. On June 4, 2021, Ms. Bauer was indicted on alleged violations of 18 U.S.C. §§ 1512(c)(2) and 2, 18 U.S.C. § 1752(a)(1), 18 U.S.C. § 1752(a)(2), 40 U.S.C. § 5104(e)(2)(D), and 40 U.S.C. § 5104(e)(2)(G) (*See* ECF Doc. No. 11).
2. A superseding indictment was issued on March 16, 2022, with the same alleged violations (*See* ECF Doc. No. 116).
3. Until undersigned counsel entered his appearance, Ms. Bauer was a *pro se* defendant with assistance from Attorney Carmen D. Hernandez.
4. On April 22, 2022, Government filed three (3) Motions in Limine (*See* ECF Doc. Nos. 121, 122, 123).
5. On May 20, 2022, undersigned counsel respectfully entered his appearance on behalf of Ms. Bauer (*See* ECF Doc. No. 129).

6. Currently scheduled and due are:

a. Oppositions to Trial Motions - May 27, 2022.

7. Undersigned counsel requires additional time to review the Government's Motions in Limine and further discuss the case history with Assistant United States Attorney James Peterson ("AUSA Peterson").

8. On May 25, 2022, undersigned counsel spoke on the phone with AUSA Peterson, who consented to the relief sought within this motion.

WHEREFORE, Pauline Bauer, through undersigned counsel, respectfully requests that the Motion for Extension of Time to File Oppositions to Trial Motions be granted, and that the new time for filing such motions be extended for 14 days until June 10, 2022, or a date deemed more appropriate by this Honorable Court.

Respectfully submitted,

s/ Komron Jon Maknoon
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