

**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 PRE-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 Pre-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. Scheduled and due were Pre-Trial Motions on May 2, 2022.
5. On May 20, 2022, undersigned counsel respectfully entered his appearance on behalf of Ms. Bauer (*See* ECF Doc. No. 129).
6. Ms. Bauer’s situation regarding representation has changed, and undersigned counsel requires additional time to review discovery before filing Pre-Trial Motions.

7. On May 26, 2022, the office of undersigned counsel received an e-mail from Assistant United States Attorneys James Peterson and Joseph McFarlane, who did not state any objections to the relief sought within this motion.

WHEREFORE, Pauline Bauer, through undersigned counsel, respectfully requests that the Motion for Extension of Time to File Pre-Trial Motions be granted, and that the new time for filing such motions be extended for 43 days until July 8, 2022, or a date deemed more appropriate by this Honorable Court.

Respectfully submitted,

s/ Komron Jon Maknoon
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