

**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.)	

**DEFENDANT’S RESPONSE TO GOVERNMENT’S MOTION IN LIMINE
REGARDING AUTHENTICATION OF VIDEO AND OTHER EVIDENCE¹**

AND NOW, to-wit, comes the Defendant, Pauline Bauer (hereinafter “Ms. Bauer”), by and through her counsel Komron Jon Maknoon, Esquire, and respectfully submits the following Response to Government’s Motion in Limine Regarding Authentication of Video and Other Evidence.

ARGUMENT

Undersigned counsel is currently reviewing the voluminous amount of discovery materials provided in this case and is, at this time, unable to stipulate or agree to authenticity of the four categories of evidence which the government seeks to introduce at trial. If undersigned counsel, after completing review of said materials as well as resolving any issues that may arise to any critical missing camera footage, finds it appropriate to stipulate to the authenticity of any of the evidence which the government seeks to introduce, undersigned counsel will inform the government prior to trial out of professional courtesy and judicial economy.

WHEREFORE, Ms. Bauer respectfully requests that this Honorable Court deny the government’s motion for a pretrial determination that the government’s proposed exhibits are

¹ See ECF Doc. No. 123

authentic under the Federal Rules of Evidence and admissible at trial, in order to allow undersigned counsel the time necessary to review the discovery and stipulate to the authenticity and admissibility of said evidence when appropriate.

Respectfully submitted,

/s/ Komron Jon Maknoon

Komron Jon Maknoon, Esquire
PA I.D. No. 90466

Maknoon & Associates, LLC
309 Smithfield St., 4th Floor
Pittsburgh, PA 15222
(412) 201-1802
(412) 774-8424 FAX

Attorney for Defendant, Pauline Bauer