

**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 MOTION TO COMPEL GOVERNMENT TO DISCLOSE THE
IDENTITY OF ANY EXPERT WITNESS IT INTENDS TO CALL AT TRIAL AND THE
NATURE OF THE EXPERT TESTIMONY**

AND NOW, comes Defendant, Pauline Bauer (hereinafter “Ms. Bauer”), by and through her counsel, Komron Jon Maknoon, Esquire, and files this Motion to Compel the Government to Disclose the Identity of any Expert Witness it Intends to Call at Trial and the Nature of the Expert Testimony, and in support thereof avers as follows:

1. Ms. Bauer believes that the Government may seek to introduce at trial certain testimony in the form of expert testimony.
2. To rebut such anticipated testimony from any expert witness offered by the Government, the defense may want to call its own expert to testify.
3. The defense will only be afforded the opportunity to rebut the expert testimony introduced by the Government if the identity and nature of the Government’s expert testimony is disclosed to Ms. Bauer early in these proceedings.
4. Such disclosure will in no way prejudice the Government and will aid the defense in preparing for trial.

WHEREFORE, Ms. Bauer respectfully requests this Court to issue an Order compelling the Government to provide him with the identity of any and all experts it intends to call at trial and the nature of the expert testimony.

Respectfully submitted,

s/ Komron Jon Maknoon

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

MAKNOON & ASSOCIATES, LLC.
309 Smithfield Street 4th Floor
Pittsburgh, PA 15222
(412) 201-1802
(412) 774-8424

kjm@maknoon-law.com

Attorney for Defendant, Pauline Bauer