UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
v.)	Case No. 1:22-mj-0161(GMH)
DOVA WINEGEART)	
Defendant.)	

DEFENDANT'S MOTION FOR LEAVE OF COURT TO FILE LATE

Comes now the Defendant, DOVA WINEGEART, by and through undersigned counsel, and requests leave of the Court under the local court rules to file the response to the Court's minute order for a supplement in the above captioned case at ECF No. 9, and for excusable neglect to submit the attached response seven and a half hours late. She provides the following:

The minute order stated the supplement was due by 12:00 p.m. on August 26, 2022. The undersigned believed the attached response was due by midnight on August 26, 2022 as would be a normal time for ECF input by designated day. The undersigned had legal work late into the night of August 25, 2022 and then proceeded to travel to Washington D.C. for the attorney tour of the U.S. Capitol on behalf of defendants. Internet en route was unreliable.

Wherefore, the undersigned for the Defendant asks the Court to accept the response or otherwise declare this motion moot if the intent was for a response by midnight.

Dated August 26, 2022

Respectfully submitted,

/s/ Carolyn A. Stewart Carolyn A. Stewart, Bar No. FL-0098 Defense Attorney Stewart Country Law PA 1204 Swilley Rd. Plant City, FL 33567

Tel: (813) 659-5178

Email: Carolstewart_esq@protonmail.com

CERTIFICATE OF SERVICE

I hereby certify on the 26th day of August 2022, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Carolyn A. Stewart Defense Attorney