

**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 TO CONTINUE STATUS CONFERENCE AND MOTION HEARING**

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 to Continue Status Conference and Motion Hearing 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, but without her codefendant (*See* ECF Doc. No. 116).
3. On May 20, 2022, undersigned counsel respectfully entered his appearance on behalf of Ms. Bauer (*See* ECF Doc. No. 129).
4. Currently scheduled is a Status Conference and Motion Hearing on August 25, 2022, at 2:00 p.m.
5. On August 18, 2022, a dear friend and mentor unexpectedly passed after very recently being diagnosed with cancer.

6. Undersigned counsel is also very close with the entire family as he shares holidays and family events.

7. The visitation and funeral/interment/family gathering will be held on August 24 and August 25, respectively.<sup>1</sup>

8. At this time, undersigned counsel respectfully requests a brief continuance of the status conference and motion hearing so he can attend the funeral events.

9. On August 21, 2022, the office of undersigned counsel received an e-mail from Assistant United States Attorneys James Peterson who did not state any objections to the relief sought within.

WHEREFORE, Pauline Bauer, through undersigned counsel, respectfully requests that the Motion to Continue Status Conference and Motion Hearing be granted.

Respectfully submitted,

*s/ Komron Jon Maknoon*  
Komron Jon Maknoon, Esquire  
PA I.D. No. 90466

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

Attorney for Defendant, Pauline Bauer

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<sup>1</sup> <https://www.legacy.com/us/obituaries/triblive-tribune-review/name/thomas-celli-obituary?id=36281405>