**UNITED STATES DISTRICT COURT**
**FOR THE NORTHERN DISTRICT OF ILLINOIS**
**EASTERN DIVISION**

| | |
|---|---|
| UNITED STATES OF AMERICA<br><br>v.<br><br>MICHAEL RABBITT, KATHERINE MARIE ABUGHAZALEH, ANDRE MARTIN, BRIAN STRAW, AND CATHERINE SHARP,<br><br>Defendants | No. 25 CR 693<br>Hon. April M. Perry |

**MOTION FOR EXTENSION OF TIME**
**TO ADDRESS COURT'S REQUEST FOR EVIDENCE**

The Court previously allowed the United States an additional three days to respond to the Court's October 9, 2026, request. *See* ECF No. 287 at 5; ECF No. 276. The United States respectfully requests an additional extension, until November 9, 2026, to comply with the Court's request. Attorneys in the United States Attorney's Office for the Northern District of Illinois have diligently collected and reviewed documents for responsiveness. But typically, the subjects of an inquiry do not bear the burden of discovery without assistance from counsel that is further removed from the inquiry. *Cf.* Department of Justice Manual § 4-5.412 (citing 28 C.F.R. § 50.15, which provides for representation of federal officials by Department of Justice attorneys). The requested short extension will allow additional attorneys for the United States to complete their ongoing additional review of documents for responsiveness and applicable privileges. *See, e.g.*, *Dellwood Farms, Inc. v. Cargill, Inc.*, 128 F.3d 1122, 1125 (7th Cir. 1997) (describing the law enforcement investigatory privilege); *United States v. Farley*, 11 F.3d 1385, 1389 (7th Cir. 1993) (describing the deliberative process privilege).

Respectfully submitted,

Dated: November 4, 2026

*/s/ Henrique Carneiro*
Stanley E. Woodward, Jr.
*Associate Attorney General*
Henrique Carneiro
*Counsel to the Associate Attorney General*
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

*Counsel for the United States of America*