

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 16-334(1) (JNE/KMM)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MOTION FOR EXTENSION OF
TIME**

PAUL R. HANSMEIER,

Defendant.

The United States of America, by and through its attorneys, Gregory G. Brooker, Acting United States Attorney for the District of Minnesota, and Assistant United States Attorneys David J. MacLaughlin and Benjamin F. Langner, respectfully submits its Motion for Extension of Time in the above-captioned matter.

The United States respectfully requests an additional 18-day continuance of the due date of its responses to Mr. Flynn's motions (from Monday, May 15, 2017 to Friday, June 2, 2017).

On April 24, 2017, Mr. Hansmeier filed six pre-trial motions. Although five of the motions are short and to the point, the defendant's motion to dismiss is more than 50 pages long and requires considerably more time and consideration from the government in order to fully respond. Although the government has begun preparing its responses to the defendant's motions, other case commitments have limited the amount of time the government attorneys could dedicate to the defendant's motion to dismiss. The government believes that the additional time requested through this motion will be adequate for the government to research and respond to the defendants' motions.

The United States respectfully submits that the requested continuance will not prejudice Mr. Hansmeier. The trial in this matter is scheduled to begin in September, leaving ample time for both parties, and the Court, to litigate and determine the issues presented by Mr. Hansmeier's motions.

Although the government will be prepared to go forward with the motions hearing as currently scheduled on June 6, 2017, the government has no objection to a continuance to allow the court or the defendant more time to review the parties' submission.

For the foregoing reasons, the government respectfully moves the Court for an order continuing the due date of the government's motions responses to June 2, 2017.

Dated: May 12, 2017

Respectfully submitted,

GREGORY G. BROOKER
Acting United States Attorney

s/David J. MacLaughlin

BY: DAVID J. MacLAUGHLIN
BENJAMIN F. LANGNER
Assistant United States Attorneys