UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
V.	*	**Cr. No. RDB-23-210**
DAVID EPSTEIN	*	
Defendant	*	
For: DAVID EPSTEIN	*	

DEFENDANT'S MOTION FOR EXTENSION OF TIME TO REORT (CONSENT)

Defendant, David Epstein, though his undersigned counsel, hereby submits this motion to extend the time for him to report to serve his jail term and as grounds and states:

1. On May 7, 2025, this Court sentenced Mr. Epstein to a period of incarceration of one year and one day, followed by nine months of home confinement. ECF 45. At that time, the Court permitted the defendant to self-surrender to his sentence on August 7, 2025. *Id*.
2. Mr. Epstein has been trying diligently to get his financial affairs in order since being sentenced in in May. Unfortunately, in the past 10 days, two of his significant agreements were canceled by the other side.
3. Therefore, he is asking for an additional 4 weeks to work out the financial problems before he goes to jail.
4. First, he had a deal to sell his employment business, PEI, for a cash payment, plus a monthly profit share (expected about $10k a month) based

on the profits from the customer base that PEI was giving to the new purchaser. He had worked on this deal for months, even before the sentencing. On July 22, 2025, just two weeks before his self-surrender date, the buyer told him they were backing out of the deal and would make no current or future payments to him or his family.

5. Secondly, Mr. Epstein had made arrangements with a real estate investor in a "subject to purchase" deal in which the buyer would obtain his house eventually at a reduced rate, but would pay part of the purchase price now, and agree to pay the mortgage payments while Epstein was in jail. Weeks ago, the investor sent Epstein a contract for his review. However, on July 23, 2025, the day after the sale of PEI fell through, the investor told Epstein that he would not go forward on the deal.
6. Obviously, his family's financial ability to survive while he is in jail is paramount to him.
7. A consequence of these unexpected changes to income he expected while incarcerated, he can no longer afford to send his daughter to Garrison Forrest private school, where she has attended since she was 2 years old. He is in the process of scrambling to find somewhere else for her to go.
8. The defendant worked to arrange financial stability for his family in anticipation of his jail service and, until recently, those plans appeared to bear fruit. Due to the backing out by both buyers, he is now faced with

trying alternate routes to find a way for his family to stay in the house and survive. An additional four weeks to surrender is requested to give him time to make the necessary arrangements.

9. Assistant United States Attorney Paul Riley advises that he consents to the granting of this motion.

10. The defendant has complied with all of his conditions of release. He has been designated to the BOP facility in Otisville, New York, as requested by this Court.

WHEREFORE, the the defendant respectfully requests that the Court permit him until September 4, 2025 to self-surrender to the facility designated by the Bureau of Prisons.

Respectfully submitted,

_____/s/_____
Richard Bardos, Of Counsel
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of July, 2025, a copy of the foregoing was served electronically by ECF to: Office of the United States Attorney, 36 South Charles Street, Fourth Floor, Baltimore, Maryland 21201.

_____/s/_____
Richard Bardos