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 FINAL MOTION FOR EXTENSION OF TIME TO REORT (CONSENT)

Defendant, David Epstein, though his undersigned counsel, hereby submits this second, and final, 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. Subsequently, Mr. Epstein had been trying diligently to get his financial affairs in order since being sentenced in in May. As outlined in this prior motion, unfortunately, two of his significant agreements were canceled by the other side.
3. Therefore, he is asked for an additional 4 weeks to work out the financial problems before he goes to jail. This Court granted his request to self surrender on September 4, 2025. ECF 49.

4. Undersigned counsel has now received a request from Esptein's wife, Danielle Epstein, to seek additional time, until October 16, 2025. She assures counsel that this is the final request.
5. As listed in the defendant's prior motion, the purchase of PEI staffing, and monthly income expected from it, fell through. As a result, the family cannot afford to stay in their house. They have located a small apartment in Towson and expect to be moving there in the next 30 days. Danielle seeks her husband's availability to assist in the move.
6. In addition, because of the move, and the decrease in income, their daughter will be starting a new school at the end of this month. At the same time, Danielle is starting a job full time in Hanover, Maryland.
7. Danielle states that both parents well be needed for transportation at the beginning until a schedule can be worked out and needs her husband present during this transition period.
8. Finally, Danielle is having dental surgery involving a series of necessary implants at some point in the next month (it was scheduled for 8/25/25, but that turns out to be her first day at the new job). She will be out of commission for at least 2 days after surgery and David would need to care for her and their daughter.
9. All of these events are occurring in the next 30 days. She has asked counsel to request an extension until October 16.
10. The defendant does not anticipate requesting any further extensions.

11. Assistant United States Attorney Paul Riley advises that he consents to the granting of this motion but advises that he will not consent to any further requests for extensions. .

12. 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 October 16, 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 25th of August, 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