

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 25-CR-0089-LA

HANNAH C. DUGAN,

Defendant.

**DEFENDANT'S MOTION FOR RECONSIDERATION
OF DECISION AND ORDER (R:117)
IN LIGHT OF REVERSAL OF UNITED STATES v. HERNANDEZ**

NOW COMES DEFENDANT, Hannah Dugan, by her counsel, and hereby moves the Court for reconsideration of its Decision and Order (R:117) denying motions to dismiss pursuant to FED. R. CRIM. P. 29 and for a new trial pursuant to FED. R. CRIM. P. 33. In defining the elements of a violation of 18 U.S.C. § 1505 and determining whether the government satisfied those elements, this Court repeatedly relied upon the case *United States v. Hernandez*, No. 3:23cr122 (RCY), 2024 U.S. Dist. LEXIS 649, 2024 WL23147 (E.D. Va. Jan. 2, 2024). On April 16, 2026, that case was reversed by the United States Court of Appeals for the Fourth Circuit. No. 24-4665, slip op., 2026 WL 1028348 (4th Cir. Apr. 16, 2026).

A motion for reconsideration is permitted under the standards set forth in *United States v. Rollins*, 607 F.3d 500, 502 (7th Cir. 2010) and is supported by the accompanying brief.

Dated this 21st day of April, 2026.

Respectfully submitted,

HANNAH C. DUGAN, *Defendant*

s/ Steven M. Biskupic

Steven M. Biskupic

Wisconsin Bar No. 1018217

STEVEN BISKUPIC LAW OFFICE, LLC

P.O. Box 456

Thiensville, Wisconsin 53092

bisklaw@outlook.com

s/ Jason D. Luczak, Nicole M. Masnica

Jason D. Luczak

Wisconsin Bar No. 1070883

Nicole M. Masnica

Wisconsin Bar No. 1079819

GIMBEL, REILLY, GUERIN & BROWN LLP

330 East Kilbourn Avenue, Suite 1170

Milwaukee, Wisconsin 53202

(414) 271-1440

jluczak@grgblaw.com

nmasnica@grgblaw.com

s/ Dean A. Strang

R. Rick Resch

Wisconsin Bar No. 1117722

Dean A. Strang

Wisconsin Bar No. 1009868

STRANGBRADLEY, LLC

613 Williamson Street, Suite 204

Madison, Wisconsin 53703

(608) 535-1550

rick@strangbradley.com

dean@strangbradley.com