

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 ADDITIONAL POST-VERDICT MOTIONS,
INCLUDING MOTION TO INCORPORATE RULE 33 MOTION
AND OTHER MOTIONS INTO COURT'S CURRENT BRIEFING SCHEDULE**

Defendant Hannah C. Dugan, by counsel, has moved for a judgment of acquittal under FED. R. CRIM. P. 29 and the Court has extended the time period for additional arguments/briefs supporting and opposing such motions. *See* R; 92. By this current filing, the Defendant hereby moves for a new trial under FED. R. CRIM. P. 33 and respectfully requests that the Court likewise extend pursuant to FED. R. CRIM. P. 45 the briefing schedule for that motion, as well the deadline for other post-verdict motions permitted to be filed by the rules. The Rule 29 deadlines, as previously set by the Court, were:

January 30, 2026: Movant Filings

February 20, 2026: Response Filing

March 6, 2026: Reply Filings

Good cause for this motion is established by the complexity of this matter, as well as the reasons previously accepted by the Court for extending the time for briefing under FED.

R. CRIM. P. 29.

Undersigned counsel has conferred with government counsel and they have indicated that they do not oppose this motion. A proposed order will be emailed to the Court's proposed order email box.

Dated this 23rd day of December, 2025.

Respectfully submitted,

HON. 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, Rick Resch

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