

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CRISTAL CABALLERO

No. 25 CR 638

Chief Judge
Virginia M. Kendall

**GOVERNMENT'S SECOND UNOPPOSED MOTION FOR AN EXTENSION
OF TIME PURSUANT TO 18 U.S.C. § 3161(h)**

The UNITED STATES OF AMERICA, by its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, respectfully moves this Court, pursuant to 18 U.S.C. § 3161(h)(7)(A), for a 30-day extension of time, to and including January 2, 2026, in which to seek the return of an indictment or to file an information in this case. In support of this unopposed motion, the government states as follows:

1. On October 6, 2025, defendant Cristal Caballero was charged by complaint with assaulting, resisting, or impeding a federal officer, in violation of Title 18, United States Code, Section 111(a)(1).
2. Defendant was arrested on October 4, 2025, and had her initial appearance before Magistrate Judge Heather K. McShain on October 6, 2025.
3. Defendant was released pursuant to certain conditions of release. Defendant requested a preliminary examination, which has since been continued at defendant's request.

4. The thirtieth day following defendant's arrest, and therefore the date by which an indictment was to be returned or an information was to be filed, was November 3, 2025.

5. On October 28, 2025, the government filed an unopposed motion for an extension of time pursuant to 18 U.S.C. § 3161(h)(7)(A). That same day, this Court granted the government's motion and extended the time for an indictment to be returned or an information to be filed until December 3, 2025.

6. The government now seeks a second extension of time to obtain an indictment or file an information. Counsel for defendant indicated that defendant does not oppose the government's motion.

7. For the reasons outlined in the sealed attachment, the government hereby seeks a 30-day extension in which to seek the return of an indictment or file an information against defendant, to and including January 2, 2026.

WHEREFORE, the United States respectfully requests a 30-day extension of time to and including January 2, 2026, in which to seek the return of an indictment or to file an information in this case.

Dated: December 2, 2025

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

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