

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	
	:	<b>Case Number 21-CR-411</b>
<b>STEWART PARKS,</b>	:	
	:	
<b>Defendant.</b>	:	<b>Hon. Amit P. Mehta</b>

**CONSENT MOTION FOR EXCLUDABLE DELAY**

The Government and Defendant Stewart Parks request that the status hearing date of April 1, 2022 in this case be adjourned approximately 60 days or until June 1, 2022. The amount of discovery is voluminous in this case, constituting thousands of pages, and that there are terabytes of forensic data to sift through. There are multiple electronic device dumps and vast data to review. There is also a large amount of global discovery that has and continues to be produced in this case on an ongoing basis. Defense needs time to look at and to evaluate all of this evidence. In addition to all of these things, there is an ongoing global pandemic that has slowed the process of doing in-person meetings. Since the last court date, the government has produced a large amount of discovery.

The Government further moves for a finding of excludable delay between the dates of April 1, 2022 and June 1, 2022. The parties agree that this case is “unusual and complex” due to the nature of the prosecution. *See* 18 U.S.C. § 3161(h)(7)(B)(ii), *see also* § 3161(h)(7)(B)(iv), and that, therefore, this time should be excluded in calculating the time within which the defendant must be brought to trial under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1).

Additionally, since the last court date, the lead AUSA has been on extended leave and the undersigned AUSA has been added to continue the litigation. In light of this personnel addition,

the government and defense need time to confer further. The parties have started plea discussions and would like time to continue the discussions.

Pursuant to 18 U.S.C. § 3161(h)(7)(A), the time period shall constitute excludable delay and that the ends of justice served outweigh the best interests of the defendant and the public in a speedy trial. The excludable delay requested is reasonable and necessary so that defendant can fully prepare for trial and review the voluminous evidence in this case.

Respectfully submitted,

MATTHEW GRAVES  
UNITED STATES ATTORNEY

By: /s/ Mitra Jafary-Hariri  
MITRA JAFARY-HARIRI  
Assistant United States Attorney, Detailee  
MI Bar No. P74460  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
mitra.jafary-hariri@usdoj.gov, (313) 226-9632

By: /s/ John L. Machado (with consent)  
JOHN L. MACHADO  
Law Office of John Machado  
503 D. Street, N.W., Suite 310  
Washington, D.C. 20001  
johnlmachado@gmail.com  
703-989-0840

Date: March 30, 2022